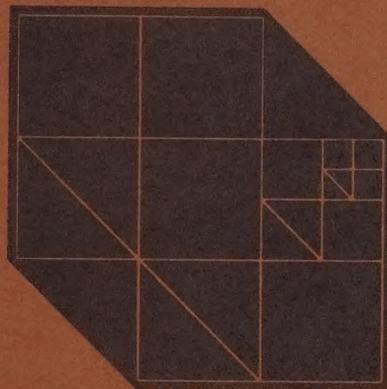


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*supplement to the final
environmental Impact report*

SUPPLEMENT TO THE
FINAL ENVIRONMENTAL IMPACT REPORT

County of Los Angeles General Plan

This volume is a supplement to the Final Environmental Impact Report (EIR) for the County of Los Angeles General Plan, dated March 2, 1979. These documents, which together constitute the Environmental Impact Report for the General Plan, were certified as being completed in compliance with the California Environmental Quality Act, the State EIR Guidelines and the County of Los Angeles Environmental Document Reporting Procedures and Guidelines, on November 25, 1980, by the Board of Supervisors of the County of Los Angeles.

County of Los Angeles
Department of Regional Planning
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TABLE OF CONTENTS

SECTION	PAGE
1.0 Responses to Comments, Board of Supervisors' Public Hearings	1 - 1
1.1 Angeles Chapter of Sierra Club	1 - 1
1.2 Marilyn R. Angle	1 - 5
1.3 Center for Law in the Public Interest	1 - 5
1.4 Coalition for Los Angeles County Planning in the Public Interest	1 - 26
1.5 Cox, Castle and Nicholson, et. al.	1 - 47
1.6 Mary Ann Graeter	1 - 48
1.7 Hill, Farrer and Burrill	1 - 48
1.8 Dick Wirth	1 - 49
2.0 Environmental Analysis of Changes to the Proposed General Plan	2 - 1
2.1 Textual Changes	2 - 1
2.2 Mapped Policy Changes	2 - 5
3.0 Statement of Overriding Considerations	3 - 1
4.0 Additional Responses to Comments	4 - 1
5.0 Environmental Analysis of Board of Supervisors' Changes to the Proposed General Plan	5 - 1
APPENDIX I Responses to Comments Related to the Land Capability/Suitability Study Carried Out By Environmental Systems Research Institute (ESRI)	I - 1
APPENDIX II Response to Comment on Using a Higher Population Per Dwelling Unit and Higher Land Use Densities in Urban Expansion areas	II - 1
APPENDIX III Response to Comment on the Relationship Between General Plan Textual and Mapped Policy	III - 1

SECTION 1.0

RESPONSES TO COMMENTS, BOARD OF SUPERVISORS' PUBLIC HEARINGS



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SECTION 1.0 - RESPONSES TO COMMENTS, BOARD OF SUPERVISORS' PUBLIC
HEARINGS

This Section is intended to respond to comments raised on the Final Environmental Impact Report (EIR) for the Los Angeles County Proposed General Plan during the public hearings held by the Board of Supervisors from May 16, 1979 to May 18, 1979, and during the four week period following the public hearings, through June 15, 1979, when written testimony was accepted.

In preparing responses to comments two determinations are necessary. The first determination is whether the comment addresses an environmental issue. If it does, a second determination must be made--whether it addresses a significant environmental issue. Generally questions on project procedure would not meet either of the two criteria listed. An EIR is written to evaluate the impacts of the project, not the process. Also, general environmental comments which lack specificity or sufficient detail to generate a response do not meet the second criterion.

1.1. Angeles Chapter of Sierra Club

1.1.1 Comment: The potentially severe environmental impacts of increased water pumping on Mono Lake and Owens Valley are not considered, and the conflict between agriculture and urban water priorities is also omitted. The economic and social impacts of increased water and energy costs to pump water south are not planned for.

Response: The Final EIR discusses the potential impacts of the plan, including the impacts on future water demands of the plan's projected population of 7.8 million in the year 2000 and the sources of supply. However, the specific impacts of

increased water pumping on Mono Lake and Owens Valley are more appropriately considered in an environmental review for the pumping activities of the water supply agency involved. The result of pending litigation on pumping, in fact, may be increased water flows into Mono Lake. The Final EIR (page 6-68) includes a discussion of water demand for the year 2000 for urban and agricultural uses, including a variety of water conservation techniques, many already on line, destined to reduce consumption while permitting the anticipated population increase of 808,000.

1.1.2 Comment: The discussion of alternatives is useless because it is impossible to compare the Proposed General Plan with the alternatives.

Response: As has been previously explained (see Section 10.0, and Appendix B, of the Final EIR), the choice of the four alternative directions was made and the environmental analysis of those alternatives was carried out at an early stage in the planning process. Because the alternatives were developed as broad policy directions, and compared at that level of abstraction they cannot be compared directly to the general plan with its specific land use allocations, policies, etc.

1.1.3 Comment: The least environmentally damaging of the four alternatives (Alternative B) was not chosen, but no findings are given other than the RPC's desire to accommodate natural population increase.

Response: The policy direction of the plan strives for an optimal mixture of the four alternatives. With regard to the "significant effects" related to the plan, see the Statement of Overriding Considerations (Section 3.0 of this Supplement). See also the response to comment #1.3.3. of the Center For Law in the Public

Interest, in this Supplement.

1.1.4 Comment: The EIR assumes the environmental benefits of a concentrated urban form, but the plan is not concentrated enough to mitigate the projected population increases.

Response: It is important to note again that the discussion of effects for the various "physical" factors in terms of urban expansion in the EIR was based on the "worst case"--i.e., the assumption that urban expansion will occur based solely on mapped policy. The Final EIR points out many mitigation measures--especially performance standards--which will help to reduce the potential adverse effects of development within areas shown on the plan's policy maps. It is also very important to point out that plan policies are oriented toward extensive infill development and revitalization in addition to urban expansion. See also the response to comments # 1.3.13 and 1.3.14 of the Center For Law in the Public Interest, included in this Supplement.

1.1.5 Comment: The potential for environmental damage by development of non-urban lands is understated since it is covered only in scenic qualities. It is uncertain which 15,000 acres of the over 753,000 acres will be developed, thus providing the worst potential for environmental degradation and excessive public costs for services.

Response: The methodology for dealing with potential impacts within non-urban areas is explained in Section 3.0. It is assumed that the development of a projected 15,000 dwelling units will result in the alteration of approximately 15,000 acres (on the basis of an assumed one acre of altered land per dwelling unit). This acreage represents less than two percent of the existing 753,000 acres of non-urban land in the county.

It is felt that it would be completely unreasonable to utilize a "worst case" analysis of all of the approximately 753,000 acres of non-urban land existing in the county in terms of hazards/resources (as is the case with the analysis of the mapped urban expansion) since plan policy neither foresees nor encourages the development of all of this acreage. Therefore, given the low densities involved, the limited amount of land likely to be developed, the existence of mitigation measures including special management procedures and performance criteria, and plan policies, it would be patently foolish to assume that all of the mapped non-urban area would be developed.

Since most of the projected development of non-urban land is to take place on large lots and since there are mitigation measures such as codes and ordinances, standards and conditions for development and special management requirements, it is appropriate to assume that hazards (e.g., geological/seismic, soils, flood/mudflow) will be mitigated. The plan establishes general conditions for development applicable within all designated non-urban areas. These general conditions are designed to assure that future development within non-urban areas, where such development occurs, will not adversely affect environmental resources, be detrimental to public health and safety, or overburden available public services and facilities.

It is also assumed that the special management procedures for agricultural preserves, significant ecological areas, and mineral resources will protect these resources within non-urban areas. The plan's specific performance criteria for non-urban hillside development will also provide adequate mitigation.

1.2. Marilyn R. Angle

1.2.1 Comment: The EIR and General Plan are vague in discussing the Santa Monica Mountains National Recreation Area (SMMNRA), and, in particular, traffic congestion in the western portion of the county relating to the SMMNRA.

Response: The SMMNRA is not the project being evaluated in the Final EIR. However, the Conservation and Open Space Element includes a policy (# 25) to participate actively in the planning for acquisition and development of this recreation area. Moreover general discussion of traffic impacts is included in Section 6.23 of the Final EIR.

More specific information relating to traffic problems in the Santa Monica Mountains is being dealt with in the Draft Malibu/Santa Monica Mountains Areawide Plan and its EIR, which are now in the final stages of preparation. Also, an Environmental Impact Statement (EIS) will be prepared by the Federal government prior to facility construction within the SMMNRA.

1.3 Center For Law in the Public Interest

1.3.1 Comment: All citizen comments about a proposed project and the EIR thereon must be addressed and responded to in appropriate detail; the Final EIR ignored much responsible citizen comment and inadequately responded to other serious citizen concerns.

Response: The Final EIR (Section 14.0) responded to all of the comments received on significant environmental issues, as required by Section 15146 (a) of the State EIR Guidelines. As stated previously, it is important to emphasize the words

"significant" and "environmental"--comments relating to insignificant environmental issues and on issues which were not judged to be environmental were not discussed. Many of the questions of the Center For Law in the Public Interest related to the methodology and supporting facts and data used in developing the plan, and these were not considered to be EIR issues. However, in the interest of providing clarification on these issues, more detailed information is provided in this Supplement.

1.3.2 Comment: The "Fifth Alternative" (the general plan policy direction) was chosen prior to the full evaluation of the department's consultant's report on Alternatives A, B, C, and D.

Response: It should be emphasized that the four alternatives A, B, C and D were developed and evaluated as four broad alternative policy directions. The Regional Planning Commission (RPC) had reviewed a staff-prepared evaluation of the four alternative directions ("Shaping the Future of Los Angeles County," dated February 15, 1977) prior to the time the policy direction was chosen in 1977. Further, a draft copy of Volume III of the consultants' report was available for review, and a presentation on the results of their work was made at a joint Regional Planning Commission/Citizens Planning Council meeting, prior to the time the policy direction was chosen in March of 1977. The complete three volume evaluation of the four alternatives by the consultants was available for review by the RPC prior to the January, 1978 public hearings on the Preliminary General Plan, and an evaluation was included in the Draft EIR which was circulated for public review before the hearings were held. There was ample opportunity for a more detailed review prior to the time the hearings of January, 1978 were held, and an additional opportunity for extensive study prior to the time the Proposed Plan was approved by the RPC on March 2, 1979. Thus, the

detailed information was available for their use and consideration. It was possible to evaluate another alternative during this time. The procedures followed were not in conflict with the provisions of CEQA or the requirements of the State or County EIR Guidelines.

1.3.3 Comment: It must be explained why alternative "B" was rejected.

Response: The relationship of the general plan to the four alternatives is discussed in Appendix B of the Final EIR ("Genesis of the General Plan Policy Direction"). As previously explained, the policy direction of the general plan is within the bounds specified by the four alternatives--Alternative B, as well as the other three alternatives, were not "rejected". The plan strives for an optimal mixture of the four alternative strategies, based on their relative ability to meet identified needs, their feasibility, and their various social and economic effects, as well as environmental impacts and public preferences.

1.3.4 Comment: The Final EIR does not deal with substantial changes made in the March, 1979 plan relative to the change from rural to non-urban, the removal of density limitations in special management areas, the deference to community plans, higher population projections, re-evaluated needs for housing rehabilitation and maintenance, and changes in the transportation network. The Final EIR does not mention or analyze the significant impacts which may result from these changes.

Response: The Final EIR does deal with the changes made in the plan. The changes did not result in any significant new impacts or add significantly to the impacts previously identified. These changes were considered to be beneficial and/or

more environmentally sensitive. The change to a "non-urban" category does not result in any significant change in potential impacts on "rural" lands,--it reflects merely a change in terminology, recognizing that the dictionary definition of the word "rural" does not adequately describe many of the non-urbanized areas of the county. The potential effects on non-urban land (as discussed in Section 3.0 of the Final EIR) are not changed--special management area performance review provisions would still be applied, and maximum densities permitted in non-urban areas remain unchanged.

With reference to special management areas, the Proposed General Plan as revised does include specific density limitations. For example, in non-urban areas, non-urban residential development may be permitted at densities ranging from a baseline of one unit per five acres to a maximum of one unit per acre. Most importantly, the conditions, standards and performance review procedures for flood plains, fault zones, potential agricultural preserves, hillsides and significant ecological areas, etc., are viewed as strong mitigating measures for potential impacts. Case-by-case review established by the special management areas will allow impacts to be reviewed and mitigated, thus providing a more specific response to characteristics of the property in question (as opposed to the inflexible protection of density standards with no case-by-case review of individual situations). Also, it is important to note that some of the statements made by the Center for Law in the Public Interest with reference to the density limitations of the Preliminary General Plan are incorrect. For example, with regard to management criteria for fault zones, the Preliminary Plan actually indicated on page II-61 that no structure shall be permitted across a trace of an active fault, and did not provide a maximum of one dwelling unit/two acres in fault zones, as was stated by the "Center." Also,

within SEAs, the one unit per 20 acres was a recommended maximum in the Preliminary Plan, but it was pointed out that higher densities might be appropriate in limited cases.

With reference to the issue of community plans, the EIR reflects the Proposed Plan's stance on community and areawide plans. The Final EIR is considered to be adequate since (1) the community and areawide plans are consistent with the Proposed General Plan (and, as explained in the introduction to the plan, they are extensions or refinements of countywide policy); (2) the Countywide Chapters and elements of the plan serve to provide policy guidance on regional issues such as hillside management and significant ecological areas; and (3) environmental documents have been or will be prepared for the community and areawide plans.

With regard to the higher population projection, the Final EIR is based on the revised projections--an increase of 808,000 persons between 1975 and 2000. As pointed out in Section 3.0 of the Final EIR (methodology) the portions of Section 6.0 dealing with energy consumption, air quality, as well as services (liquid/solid waste, transportaion, water) and socio-economic factors, are based on the revised projections. The newer projections represent more recent trends and are consistent with those of SCAG (see Appendix A of the Final EIR).

With reference to the revised figures for housing rehabilitation and maintenance, the rehabilitation projection was decreased from 327,000 to 185,000 unsound units (1975-2000) based on current demolition and rehabilitation activity. This downward shift allowed an increase in projected rehabilitation activity in sound units preserved by heavy maintenance. No new adverse impacts on the environment were associated with these changes.

As to the potential impacts of the transportation network (the Plan of Highways--a sub-element of the general plan), these are addressed in the Final EIR. Changes from the Preliminary to the Proposed Plan resulted in the elimination of 2,300 miles of highway routes within unincorporated areas, and the reclassification of 700 miles to better reflect expected usage. Note that the changes to the Plan of Highways were suggested by the Center For Law in the Public Interest. Also certain proposed routes were relocated to coincide with existing roadways to maximize use of in-place facilities and avoid unnecessary disruption of the environment. The Final EIR reflects the impacts of urbanization--the acreage figures provided in Section 6.0 for the various hazard/resource factors reflect urbanization including roadways as well as other urban development. Potential effects on SEAs are addressed in Section 6.8 of the Final EIR. Additional changes to the Transportation Policy Map are discussed in Section 2.2 of this Supplement.

1.3.5 Comment: The Final EIR ignores the changes made on specific parcels by the RPC during the course of its deliberations and does not analyze their significant impacts.

Response: The Final EIR does consider those specific parcels where changes occurred. The figures for urban expansion in Sections 6.1, 6.4, and 6.8 reflect, at the planning area level, the added parcels in terms of acreage of hazard/resources potentially affecting or affected by urban expansion. An additional 200 acres subject to slope instability, 200 acres subject to high fire hazard, and 200 acres of chaparral vegetation were added. However, on a county-wide basis, these changes are very minor and make no difference in terms of overall identification of significant effects as discussed in Section 7.0 of the Final EIR. The additional mapped urban expansion changes occurring since the Board hearings, although also minor, are discussed in Section 2.0 of this Supplement.

1.3.6 Comment: The Final EIR's generalized references to vicinities where urban expansion is in "conflict" with hazard/natural resource factors is unacceptable.

Response: The Final EIR did not state that urban expansion was in "conflict" with any hazard or natural resource factors. It should be remembered that this EIR has been prepared for a general plan covering the entire area of Los Angeles County. As has been pointed out (see comment and response #4 on page 14-18 of the Final EIR), the information in the EIR is already provided at a greater level of detail than the plan itself. This level of detail exceeds what is mandated by the State EIR Guidelines. To provide even more detailed information becomes speculative and inappropriate. The plan is directed to the planning area level, but the Final EIR attempts to identify communities/cities potentially affected. The specific maps used in identifying these areas are available for review at the main office of the Department of Regional Planning. Since the plan is a countywide general plan, any greater level of detail would not be appropriate. Also, as explained in Appendix D of the Final EIR, the data reliability of the source material precludes any meaningful analysis below the general level of detail presented. In addition, it should be remembered that the assumption this urban expansion will occur based solely on the plan maps represents the "worst case" and that actual urban development is likely to occur at a much lesser level, given the plan's textual goals, policies and performance standards. As pointed out in the Proposed Plan, the urban expansion lands shown on the map are "not a prediction of the extent of new urbanization between 1975 and 2000" (page I-52).

1.3.7 Comment: Judge Thomas' ruling mandated the County to develop an open space ordinance and the EIR to evaluate the open space resources within the County to determine what regulatory

techniques would best protect them.

Response: The Final EIR evaluates the impacts of the Proposed Plan, including the open space provisions. The environmental review included the action programs dealing with implementation of the open space provisions of the plan, as contained in the Land Use Element and Conservation and Open Space Element Recommended Action Programs in the plan's Implementation Chapter. Ordinances implementing the plan are being prepared, and will be subject to review and public hearing.

1.3.8 Comment: What is the Department's actual forecast for future county-wide growth through the year 2000?

Response: The general plan is based on a projected population increase of 808,000 persons by the year 2000. This figure reflects an 11 percent increase in countywide population from 1975 to 2000. Appendix A in the Final EIR deals with the methodology for developing the year 2000 plan projections, and there is also a Technical Supplement to the Proposed Plan which includes a discussion of the "Limitations of Population Measurement and Projections". However, the 808,000 figure is the "actual" projected population increase.

1.3.9 Comment: Certain consultants' recommendations for development "suitability" were changed, so as to better "fit" specific residential development proposals.

Response: The allegation has no basis in fact. The consultant responsible for the formulation of a procedure for correlating and interpreting environmental information and for the creation of an environmental data bank for portions of Los Angeles County was Environmental Systems Research

Institute (ESRI). At the time of the allegation, ESRI immediately reported that "none of the County staff ever approached us to massage our criteria or recommendations to better fit any specific residential development proposals" and "ESRI reiterates the integrity of its recommendations". Larry Livingston, associated with ESRI in the land capability study, also immediately rejected the allegation.

The ESRI report and its key product, the Natural Resources Inventory map, made a very important contribution to the preparation of the Plan's land use recommendations. However, it is not--and was never intended to be--a land use plan in itself. In any case, the EIR reflects the recommendations of the Plan as presented to the Board of Supervisors and the false allegation has no bearing on the merit of the EIR.

1.3.10 Comment: The alternative/mitigation measure of mapping lands classified as A and B rather than D and E for urban expansion is unaddressed in the Final EIR. Why not direct all urban expansion away from lands unsuitable for urban development because of hazard/natural resource conflicts?

Response: It would not be appropriate to map scattered and remote areas for extensive urban development simply because they were classified as "A" and "B" by ESRI. The ESRI report recommends that consideration be given to additional factors related to suitability for urban development. This issue is discussed in Appendix I to this Supplement.

1.3.11 Comment: The consultants' recommendations regarding maximum advisable residential densities within hazard/resource areas, including densities on D and E lands, are entirely omitted from discussion in the Final EIR.

Response: Appendix I of this Supplement discusses the reasons why a small portion of the plan's mapped urban expansion is located within lands classified as "D" and "E" by ESRI.

1.3.12 Comment: During its deliberations on the Proposed Plan, the RPC repeatedly expressed "great dissatisfaction" with the level of information provided to them on several significant issues including hillside management standards, countywide versus community plans, special management areas, development potential of infill areas, capacity of the infrastructure of the County in unincorporated areas, housing needs and costs, factual basis for the population projections, and adverse impacts on and mitigation measures for agricultural areas.

Response: The RPC was presented with substantial information on hillside management standards (at their May 1, August 3, November 2, November 30, and December 7, 1978 meetings, as well as their February 8 and February 16, 1979 meetings); countywide versus community plans (at their meetings of April 27, August 16, and August 31, 1978, and February 28, 1979); special management areas (meetings of May 8 and August 14, 1978; development potential of infill areas (February 8, 1979); low and moderate income housing (February 8, 1979); population projections (April 13, and May 17, 1978, and February 8, 1979); and agricultural land (February 16 and 28, 1979). On most of these dates, reports and/or memos were presented to the RPC for their discussion. The specific documents are on file at the main office of the Department of Regional Planning. With regard to the infrastructure capacity of the county in unincorporated areas, our review of the record does not indicate any expressions of dissatisfaction with the information provided. The plan and EIR do deal with this issue in terms of the plan monitoring process (a recommended action discussed in the Implementation Chapter)

and the development qualification procedure (discussed in the "Technical Supplement" to the plan, in Appendix D-2).

The Final EIR has addressed these issues where environmental questions are involved. Specifically, hillside management standards and special management areas are discussed in Sections 6.13, 6.8, 6.10, 6.1 and 6.3 (scenic qualities, biota, agricultural resources, seismic hazard and flood hazard), primarily as mitigation measures. Infill development is discussed in terms of hazards/physical resources (as well as in Section 3.0) and impacts/mitigation measures for agricultural areas are also discussed (see Section 6.10). The question relating to the infrastructure capacity of the county is reflected in the EIR in terms of some services--e.g., liquid waste capacity--but will also be addressed as a part of the general plan monitoring process and at the private project level (including the development qualification procedure mentioned above). The basis for the plan's population projection is not considered to be an environmental issue, but is addressed in Appendix A of the Final EIR. The Final EIR deals with housing needs in Section 6.17.

1.3.13 Comment: Why not allocate less of the proposed 700,000 (now 808,000) "policy" projected increase in the countywide population to the "fringe" planning areas (Malibu/Santa Monica Mountains, Santa Clarita Valley, Antelope Valley, East San Gabriel Valley) and more to the planning areas within the existing urbanized areas, thereby reducing the corresponding land use allocations for future urban growth in those fringe areas? (This would also be more in accord with SCAG and L. A. City population allocations).

Response: The Proposed General Plan contains numerous policies designed to promote a more concentrated urban form (e.g. General

Goals and Policies Chapter, # 17, 34, 32; Land Use Element, # 1, 2, 3, 5, 10, 17, 21; revitalize the older urban areas (e.g. General Goals and Policies Chapter, # 19, 30, 39, 40, 42, 44; Housing Element, # 7, 13, 19); conserve energy (e.g., General Goals and Policies Chapter, # 6, 12, 15, 64; Conservation and Open Space Element, # 2, 3 and 30; Land Use Element, # 22; Housing Element, # 33; Transportation Element, # 3, 6, 7, 11, 12, etc; Economic Development Element, # 24, 25, and 26) and so forth. Moreover, they are intended to reverse existing trends toward population losses in the Central, East Central, Burbank/Glendale, South and West San Gabriel Valley planning areas through a policy emphasis on revitalization and rehabilitation. However, the plan implicitly recognizes that strong forces currently at work cannot be reversed overnight. For example, covert redlining practices in inner cities, VA requirements that encourage new construction rather than rehabilitation, and inadequate community services in older urban areas, etc., are explicit and implicit policies presently in effect. Moreover, many are set by private organizations and governmental agencies over which Los Angeles County has no control whatsoever. As a result, it is anticipated that during the initial years of the 1975 - 2000 planning period, rapid population growth will continue in such outlying planning areas as the Santa Clarita Valley.

Similarly, promoting development in older urban areas will also take time to implement. An effective multimodal transportation system will have to be built, older areas revitalized and funding found. Hopefully, emerging trends and changing public opinion, together with the plan's overall revitalization strategy for the county, will provide the necessary guidance to promote such change. However, time is required before the existing intricate web of financial, regulatory and market place forces can be altered to provide a direction that is supportive of stated plan policies.

Consequently, it may be concluded that the population projections, particularly their allocations among planning areas, are not inconsistent with the plan's policies merely because they acknowledge the realities of the present. In addition, the Regional Planning Commission in their decision to promote a more concentrated urban pattern, tempered this policy direction with the following statement in the General Goals and Policies Chapter:

...While concentration is viewed as the principal means of achieving an efficient and environmentally attractive pattern of development--and thus was chosen as basic policy of this Plan--all development need not fit a concentrated pattern, especially where developments agree to pay the marginal public costs...
(General Goals and policies Chapter, p. I-18).

The Commission felt a certain amount of flexibility should be used in the implementation of plan policy in order to provide for "a variety of living styles and dwelling unit types." (ibid.) Furthermore, they were concerned that rigid regulatory controls to promote a concentrated urban pattern of development could be counterproductive in that out-migration from Los Angeles County to regional fringe areas would be encouraged. Thus, as a policy guide for governmental actions that may ultimately and profoundly affect the lives of County residents, the Proposed General Plan must incorporate realistic assumptions regarding the timing and nature of implementation for it to be a practical document. Moreover, it would be highly undesirable for the plan to advocate any immediate reversal of existing policies and trends due to the potentially serious economic and social dislocations that could result.

Also, in keeping with the overall intent of plan policies, the projections in this plan are extensions of trends modified to reflect the impact of plan policies. This is particularly the case with respect to the migration and distribution of population which may be influenced directly by plan policies as opposed to natural increases which are not subject to direct policy influence. As a result, the population projections for the different planning areas show considerable variation in their anticipated growth patterns.

As the following table indicates, those planning areas in which most of the new urban expansion is projected (Malibu/Santa Monica Mountains, Santa Clarita Valley, East San Gabriel Valley and San Fernando) are projected to experience a majority of their population growth during the first ten years, or between 1975 and 1985. Conversely the bulk of growth in those older planning areas (Burbank/Glendale, West, Central, East Central, South, Southwest, Southeast and West San Gabriel Valley) where recycling and revitalization policies are directed, is projected to occur between 1985 and the year 2000.

	1975-1985		1985-2000		1975-2000	
	Population Increase	Percent of Growth	Population Increase	Percent of Growth	Population Increase	Percent of Growth
	"Urban Expansion"					
Planning areas	170,000	56%	108,000	44%	278,000	100%
"Older"	132,000	21%	268,000	79%	400,000	100%
Planning Areas						

In this discussion, the Antelope Valley planning area has been purposely excluded. Historically, it has functioned as

a separate urban and economic entity and the intent of plan policy for this area is to promote "the development of an autonomous urban area with an expanded and diversified economic base..." (General Policy #59, page I-31). Also, scattered throughout the Antelope Valley are a variety of communities that are uniquely identifiable from their surroundings. Finally, a key assumption in the development of the projections was the impact of Palmdale Airport. Between 1975 and the year 2000 the Antelope Valley is expected to grow by 129,000 residents, of whom 106,000 will be added after 1985, provided the airport is in operation. However, if such an event does not materialize, the proposed Monitoring System could trigger an appropriate adjustment, thereby reducing the year 2000 projected population increase to as low as 52,000.

With respect to the projected levels of population growth made by SCAG and the City of Los Angeles for the year 2000, these are very close to that of the Proposed General Plan. Thus, the basic assumptions used for the development of the projections were similar for all three agencies.

In response to the Regional Planning Commission's policy direction to reverse trends towards population losses in the inner city planning areas, the population allocations reflect projected population increases in contrast to the population losses that are actually occurring. For example, in the Central planning area a population increase of 90,000 is projected by the year 2000. However, if the projections were based solely on an extrapolation of 1970-75 trends, there would be a loss of about 305,000 for the planning area.

Although significant population increases are projected for older urban areas, these have purposely been balanced by con-

tinued increases in urban expansion areas to reflect plan policies to minimize the dislocations that could occur in the older urban areas due to massive population increases. Since extensive residential recycling to higher densities can generate adverse social and economic costs, the plan explicitly "rejects the concept of wholesale recycling of older urban areas... to avoid disrupting neighborhoods. It is to be applied only on a selective basis where essential to the realization of residential revitalization, or to replace unrepairable, unsafe structures." (Implementation Chapter, p. VIII-11).

1.3.14 Comment: Why not adopt a phasing policy to allocate the current mapped "supply" of urban expansion residential land use in accordance with current projections of land use demand?

Response: The Proposed General Plan makes explicit statements regarding the desired constraints on the process of urban expansion. The overall intent of such constraints is summarized by Policy 22 in the General Goals and Policies Chapter:

"Ensure that new development in urban expansion areas will occur in a manner consistent with stated Plan policies and will pay for the marginal public costs (economic, social and environmental) that it generates."

The desired spatial pattern of urban expansion is further elaborated in the discussion of the General Development Policy Map:

"In the most general terms, urban densities are appropriate wherever the users are willing to pay for the marginal public costs (economic, social and environmental) of development. That is, urban development is appropriate wherever the marginal capital and opera-

ting costs for urban services are paid for by the development, where critical regional resources are either protected or the general public is recompensed in some manner by their full or partial loss, where hazards to life or property are avoided or adequately mitigated, and so on. The possible creation of a system to adjust the urban/non-urban boundary as these costs are internalized (paid for by the development itself) is proposed in the Implementation Chapter of the Plan."

The Plan calls for a development approval procedure that is sensitive and adjusts to changing parameters as urban development progresses. The methods to be employed are suggested in policy 18 of the Economic Development Element:

"Establish procedures to enable the County to use cost/benefit/revenue studies or other appropriate methods, to evaluate new developments on a community-wide level in order to ensure that the benefits of new development exceed its costs and risks."

The criteria by which proposed new development is to be evaluated are specified in the Implementation Chapter under Recommended Action #2:

The criteria to be developed may include, but would not necessarily be limited to, such factors as:

- Costs of providing urban services such as police, fire sewage disposal, schools, etc.;
- Avoidance or mitigation of hazards to acceptable levels;
- Compatibility with preservation of significant natural resources;

- Proximity to local commercial goods and services;
- Proximity to job opportunities;
- Impact on publicly held or privately dedicated open space; and
- Existence of unique circumstances which make urbanization undesirable.

The first step in implementing these policies and recommendations is the proposed Development Qualification Procedure which has been added as Technical Supplement D-2 to the Proposed General Plan. This procedure is designed to ensure that urbanization of vacant or agricultural land at the urban fringe, located within an area designated as urban expansion, will occur in an orderly fashion and conform to goals and policies stated in the general plan. To qualify for approval under the Development Qualification Procedure, each proposed development in an urban expansion area, basically, will be required to:

1. feasibly mitigate significant environmental impacts or risks it created;
2. adhere to the Proposed General Plan Open Space Ordinances protecting significant open spaces; and
3. utilize existing capacity in public services, or pay in a reasonable manner for urban service extensions.

Development qualification is, in effect, a form of phasing; however, it is more desirable because of its dynamic nature and sensitivity to changing conditions. Traditional mapped phasing requires the establishment of arbitrary spatial boundaries within which urban development will be permitted to occur within defined periods of time. The establishment of the appropriate boundaries and target dates is extremely difficult, as is the anticipation of market forces. Another disadvantage of mapped phasing is its rigidity and need for a formal amendment process to reflect up-

dated growth projections during the life of the general plan. Mapped phasing may be appropriate in a contiguous, relatively flat urban area under a single jurisdiction, which could be divided into concentric zones around an urbanized core. However, such a phasing process presumes perfect knowledge on the part of the planner--an unattainable condition in an area as complex and dynamic as Los Angeles County.

Thus, it is concluded that the Development Qualification Procedure is a dynamic, sensitive, and readily implementable approach to the question of phased development.

1.3.15 Comment: The Statement of Overriding Considerations is only two pages in length and states the broadest possible conclusions. The specific "overriding concerns" leading the Department to propose urbanization for the acreage located in hazard/resource areas must be provided.

Response: See the revised Statement of Overriding Considerations, included in Section 3.0 of this Supplement.

1.3.16 Comment: Why not use a higher population per dwelling unit figure in calculating the projected need for dwelling units ("demand") to house the future population increase (higher Population Per Dwelling Unit figures are projected by both SCAG and Los Angeles City), and/or alternatively, why not utilize higher land use densities for proposed new urban expansion and in-fill depicted on the land use maps ("supply")--either of which would (not) necessitate the need to designate such large areas of urban expansion? (Remainder of comment is presented in Appendix II to this Supplement.)

Response: It is explained in Appendix II to this Supplement that

the higher percentage of low to low/medium density residential acreage in mapped urban expansion areas is based primarily on community preferences, demands of the marketplace and environmental considerations such as topography.

1.3.17 Comment: The relationship between the plan's textual policies and the land use allocations depicted on the plan maps must be discussed in the EIR. It must be explained how the land use maps were prepared.

Response: It is explained in Appendix III of this Supplement that textual and mapped policies in the Proposed General Plan are essentially consistent and mutually supportive. With reference to the comment on how the land use maps were prepared, a general discussion is provided in Technical Supplement B to the General Plan. It is explained that the urban designation is based on considerations which include: the availability of urban services; the natural capability of land to sustain urban development; the exclusion of lands determined to be of particular natural resource value; local preferences/community character; and socioeconomic need. Appendix C of the Final EIR also deals with this issue in terms of the five planning areas where a significant conversion of vacant lands to urban use is anticipated (e.g., San Gabriel Valley, Malibu/Santa Monica Mountains, San Fernando, Santa Clarita Valley and Antelope Valley).

1.3.18 Comment: Why is the overage factor so high, especially in the Antelope and Santa Clarita Valleys?

Response: Appendix C of the Final EIR dealt with the concept of "overage". It was pointed out that the population-oriented plan capacity concept was not applicable on a countywide basis. An alternative approach to dealing with the land demand/supply

question was presented, dealing with each of the five major planning areas where significant conversion of vacant lands to urban use is anticipated (i.e., San Gabriel Valley, San Fernando, Malibu/Santa Monica Mountains, Santa Clarita Valley and Antelope Valley). This discussion includes an identification of the relationship between projected demand and allocated supply.

It is again important to emphasize that population capacity figures are not rooted in or derived from an extrapolation of plan policy, but rather represent speculation as to future growth and development trends should the policies of the plan be largely ignored. As is indicated throughout the plan document, as well as in the Final EIR, policy maps are to be reviewed, interpreted and applied within the overall context of the plan goals and objectives. Therefore, an approach wherein only the mapped supply is used to determine where and how future urban development will take place is inappropriate.

With reference to the Antelope Valley, in particular, the factors influencing the urban land supply are related primarily to the attitudes and preferences of community residents (as expressed in the Preliminary Antelope Valley Areawide Plan, as well as in the locally adopted plans of the cities of Palmdale and Lancaster). The lands shown on mapped policy as suitable for urban development are relatively undifferentiated in terms of capability to support urban development (i.e., limited environmental constraints) and are generally served by urban infrastructure. The discussion of "D" and "E" lands by planning areas in Appendix I to this Supplement also deals with the urban expansion lands in the Antelope Valley. This discussion indicates that the urban expansion designation is appropriate.

With regard to the Santa Clarita Valley, again the supply of

urban expansion land in that planning area reflects the stated and mapped policies of the adopted Santa Clarita Valley Area-wide Plan. The discussion of "D" and "E" lands in Appendix I indicates the reasons for the supply of urban expansion land in that planning area.

In addition, it is important to reiterate that the Development Qualification Procedure has been added to the Proposed General Plan as Technical Supplement D-2. This procedure will, in effect, function as a "phasing" mechanism (see discussion in response to comment # 1.3.14 in this Supplement). This procedure is designed to ensure that urban expansion occurring on vacant or agricultural land at the "urban fringe" will occur in a timely and orderly fashion and conform to the goals and policies of the plan.

1.4. Coalition for Los Angeles County Planning In the Public Interest

1.4.1 Comment: The EIR does not adequately respond to the Coalition's 64 pages of comments concerning the January, 1978 general plan and Draft EIR.

Response: It is felt that section 14.0 of the Final EIR adequately addressed the significant environmental issues raised during the public response period. Comments specifically directed to general plan matters, as opposed to environmental issues, were not addressed. Also, some comments lacked specificity.

1.4.2 Comment: The EIR does not adequately discuss the impacts of urban intrusion into unstable slope areas in the East San Gabriel Valley and does not adequately cover alternatives.

Response: This question has previously been responded to. See

Pages 14-12 and 14-13 of the Final EIR. Given the generalized scale of the plan, it is maintained that this impact is adequately addressed. As pointed out, there are approximately 4,000 acres (based on the "worst case" assessment) subject to this potential hazard in the East San Gabriel Valley, located primarily in the Diamond Bar, Rowland Heights, West Covina, Pomona/Walnut and Industry areas. In addition, an explanation of why mapped urban development is shown within ESRI's "D" lands (which includes areas with slope instability) in the San Gabriel Valley is provided in Appendix I of this Supplement. With reference to alternatives, as has also been pointed out previously (see page 14-46 of the Final EIR), four general policy directions were considered as alternatives, rather than alternatives to each individual impact category.

1.4.3 Comment: The EIR is deficient in not including calculations for infill development and urban expansion within the "C" category, including lands with 16-30 percent slope and subject to fire hazard (now identified as "B" lands).

Response: See Appendix I of this Supplement for an explanation of how the consultants' (ESRI) study was integrated into the land use planning process. Basically, while the Final EIR provided calculations for the "D" and "E" categories in terms of "cumulative effects," the individual environmental factors associated with the "B" and "C" categories, including slope and fire hazard, are also discussed. Calculations for potential mapped urban expansion and infill development are provided in the Final EIR.

1.4.4 Comment: The Proposed General Plan and the EIR are almost totally silent on proposals to improve air quality, and issues are not addressed in sufficient clarity; the discussion must be re-written and expanded.

Response: This comment has previously been responded to in the Final EIR (see page 14-21). The discussion of air quality effects has been reviewed by SCAQMD, which indicated, in a letter dated March 14, 1978, that it was adequate. Also, the Final EIR was sent to the State Clearinghouse, and no responses were received. Finally, the Air Quality Section was revised in the Final EIR to reflect the Air Quality Management Plan (AQMP) for the basin. This plan was approved by SCAQMD and the State's ARB and is pending action by EPA.

1.4.5 Comment: The EIR does not adequately articulate the impacts of the general plan and alternatives on air quality. The EIR does not state the population on which the calculations of air quality impacts was based.

Response: The EIR does state that the air quality analysis is based on a projected population of 7.8 million in the year 2000. As explained in Section 3.0, the impacts of services, including liquid/solid waste, water and transportation, as well as energy consumption, air quality and social/economic impacts, are based on the plan's projections, including a population increase of 808,000 by 2000. With reference to impacts and alternatives, the impacts of the plan on air quality are discussed in Section 6.6, and the alternatives to the plan are discussed in Sections 8.0-10.0 of the Final EIR. The alternatives analysis reflects the same general trends as shown in the AQMP.

1.4.6 Comment: The EIR must indicate the impacts of the loss of agricultural land, and the alternatives available to preserve existing and potential agricultural land.

Response: See the previous response to this comment in the Final EIR on page 14-28.

1.4.7 Comment: The mitigation measures for the loss of agricultural land are inadequate and must be strengthened with concise programs to protect agricultural resources.

Response: One of the objectives of the proposed Conservation/Open Space Element is the preservation and protection of prime agricultural lands. Corresponding policy from this element emphasizes preserving lands best suited for agriculture, particularly those currently devoted to agricultural production. Although plan policy is general in its language, more specific measures are outlined in the Action Program section of the Plan Implementation Chapter. A complementing objective of the Land Use Element is encouraging the efficient use of land compatible with and sensitive to open space resources (including agriculture). The policies within the Land Use Element that reflect the plan's overall intent include:

- Protect identified Potential Agricultural Preserves by discouraging inappropriate land division and allowing only use types and intensities compatible with agriculture.
- In non-urban areas outside of Potential Agricultural Preserves, encourage the retention and expansion of agriculture by promoting compatible land use arrangements and providing technical assistance to involved farming interests.
- In urban areas, encourage the retention of economically viable agricultural production, e.g., high value crops such as strawberries, cut flowers, nursery stock, etc., through the identification and mitigation of significant adverse impacts resulting from adjacent new development.

The Land Use Element further identifies "General Conditions and

Standards for Development" applicable within Potential Agricultural Preserves. Within such areas, use of land shall be subject to standards and conditions established by exclusive agricultural zoning.* Parcels within identified Potential Agricultural Preserves, five acres in size or larger, may be developed for non-urban residential use at densities not exceeding one dwelling unit per ten acres. Approval of such non-urban residential development shall be subject to compliance with applicable provisions of adopted community, areawide, and countywide plans, shall be accompanied by a finding that the proposed use will not, individually or in combination with surrounding residential use patterns, substantially impair or have a significantly adverse affect on adjacent agricultural activities.

In non-urban areas outside Potential Agricultural Preserves, the plan encourages the retention and expansion of agriculture by promoting compatible land use arrangements. The intent of plan policy is to preserve and protect agricultural resource areas from the intrusion of incompatible uses which conflict with or preclude viable agricultural activity.

The plan further supports the establishment of voluntary agricultural preserves (including areas in addition to those mapped as "Potential Agricultural Preserves") such as those provided for by the California Land Conservation Act. The Act provides incentives for the preservation of prime agricultural lands, and sets forth specific criteria governing the creation and maintenance of recognized preserves.

* Such exclusive agricultural zoning would minimize conflicts between agricultural and other non-urban uses.

On September 21, 1979, the Regional Planning Commission discussed the General Plan Board Motion regarding Potential Agricultural Preserves. Based on the Commission's actions, the following changes were made in the general plan.

Amend Recommended Action #2 (Implementation Chapter) to read:

- Implement the California Land Conservation Act (Williamson Act) and initiate contracts with farmers in order to continue the viability of commercial agriculture. Encourage and seek funding for demonstration projects related to: a) crop production for energy fuel substitutes, b) development of new water-conserving irrigation methods, and c) uses of reclaimed water. (Agricultural Commissioner, Assessor, Board of Supervisors) (Policies 3 and 5).
- Add a new Recommended Action #3 (Implementation Chapter) to read:

Review and make recommendation to the Regional Planning Commission periodically on the area depicted as Potential Agricultural Preserves, in response to changing conditions related to water supply and pricing, market demand, current farming practices and requests initiated by farmers for inclusion into, or deletion from Potential Agricultural Preserves. (Agricultural Commissioner, Regional Planning) (Policy 5).

- Revise the "Potential Agricultural Preserves" shown on the Special Management Areas Policy Map. Delete areas inappropriately mapped due to: a) subdivision of fringe areas into

parcels too small for viable farming, or b) their status as hillside grazing land, intermittently used. Add selected areas identified as being highly productive. Mapping changes will be coordinated and agreed to by the Agricultural Commissioner. All land deleted or added will be shown as non-urban or open space on the Land Use Policy Map.

In summary, the Proposed Plan seeks to consolidate areas most viable for continued agriculture and protect against the further subdivision into small ownerships of land within Potential Agricultural Preserves.

1.4.8 Comment: The EIR is deficient in its coverage of agricultural issues, in regard to the Antelope Valley.

Response: It is acknowledged in the Final EIR (see Section 6.10) that there is a potential for a loss of 3,900 acres of existing agricultural land and 25,900 acres of potential agricultural land to urban development in the Antelope Valley. This is based on the "worst case" analysis. As is pointed out in Appendix I to this Supplement, the Proposed Plan does recognize the continuing long-term viability of agricultural production in the Antelope Valley. The plan recommends that 182,000 acres of existing and potential agricultural lands be set aside in "Potential Agricultural Preserves." In addition, 4,700 acres of prime agricultural land have been removed from the urban expansion designation in the Antelope Valley and reclassified as Potential Agricultural Preserves and other non-urban, as noted in Section 2.2.5 of this Supplement.

1.4.9 Comment: The EIR does not discuss the impact on agricultural land in terms of the loss of open space, as well as the impact of

small lots in agricultural zones.

Response: This comment has previously been addressed, on page 14-27 and 14-28 of the Final EIR. See also the responses to comments # 1.4.7 and 1.4.32 in this Supplement.

1.4.10 Comment: The EIR must measure the impacts of one unit/20 acres density in SEAs and a one unit/five acres density in SEA buffer areas.

Response: The EIR discusses SEAs in Section 6.8. The plan does not propose a density of one unit/20 acres in SEAs or one unit/five acres in SEA buffer areas. No specific densities are proposed--each development proposal must demonstrate compatibility with the existing biotic resources. This will be based on a detailed biotic survey, which is to be carried out for each such specific proposal, as part of the SEA performance review process. This performance standards process provides more environmental protection than an arbitrary density standard not based on detailed survey data or specific project design.

1.4.11 Comment: The EIR is deficient in not measuring the impacts of the plan provisions dealing with SEA compatible land uses, design compatibility criteria, and the performance review procedure and in "practically ignoring" SEAs in the description of biota.

Response: The aspects of the plan dealing with SEAs mentioned above--compatible uses, design compatibility, and the performance review procedure--are dealt with in the EIR. The designation of SEA compatible uses is not considered to be associated with adverse effects--as is stated, a detailed biotic survey, and such conditions as may be necessary to assure protection of identified

ecological resources will determine what uses and densities may be compatible. As stated in the Proposed General Plan, the intent is to preserve the County's significant ecological resources and habitat areas in as viable a condition as possible. The SEA design compatibility criteria, as well as the performance review procedure are also intended to help protect and preserve SEAs.

1.4.12 Comment: The EIR must address the issue of scenic areas and the impacts of urban expansion and the Arterial Highway Network on scenic resources.

Response: An attempt has been made to address the impact of urban expansion on scenic resources--see response to comment # 1 of the Coalition For Los Angeles County Planning in the Public Interest on page 14-34 of the Final EIR. With regard to the Arterial Highway Network, see the bottom of page 14-38 in the Final EIR--the effects of the highway network on scenic qualities is reflected in the acreage of urban expansion potentially affecting scenic qualities (as discussed in Section 6.13 of the Final EIR).

1.4.13 Comment: The EIR must clearly state the impacts of urban expansion on hillside land and must indicate alternatives and mitigation measures. The growth-inducing development of hillside areas is not adequately covered.

Response: The Final EIR discusses impacts of urban expansion on hillside land in terms of scenic qualities in Section 6.13. The acreages of hillside land potentially affected are listed in that Section. Mitigation measures are also discussed. As explained in Section 3.0 of the Final EIR, slope in itself is not considered as an environmental factor, but rather the specific hazards and resources associated with steeper slopes --i,e., geologic/soils, mudflow and fire hazards, as well as

scenic resources. The impacts and mitigation measures associated with each of these individual factors are discussed in the Final EIR. As has been mentioned previously, alternatives are discussed in Sections 8.0, 9.0, and 10.0 at the plan level and as alternative scenarios rather than for each individual environmental factor. The growth-inducing aspects of the plan are discussed in Section 13.0.

1.4.14 Comment:

--The EIR contains population capacities for the alternatives (A, B, C, D) and for the PHEL projections but not for the "real plan" which could propose well over a 10,000,000 population.

--The plan which was finally mapped was a "phantom" plan as its true dimensions are not revealed in the general plan and EIR. Why was a "worst case" analysis used in the EIR where such "worst case" was not revealed in the general plan?

--The Proposed General Plan and EIR do not reveal the true land use allocations resulting from using the "alternative approach/worst case."

--The tables in the various Section 6.0 categories in the Final EIR must be translated into densities proposed and numbers of people subjected to hazards.

Response: First, the EIR did not include population "capacities" for the alternatives, but did include population projections for the alternatives as well as the Proposed General Plan. There were no so-called population "capacities" ever developed for the alternatives since only sketch maps were prepared to illustrate the broad policy directions. The plan is based on a projected popula-

tion of 7.8 million by the year 2000, not 10,000,000 (see Appendix A of the EIR dealing with the population projection). Secondly, the "real" plan is not the plan maps by themselves, as is suggested, but includes (1) the projections; (2) the textual goals and policies (including conditions for development); (3) the policy maps (including the legend descriptions); and (4) the implementation measures.

Since there is no practical way of knowing precisely where urban development might occur within the urban areas shown on the plan maps and what the specific project design will be, the EIR assumed a "worst case" development of all of the mapped urban development, based only on mapped policy, as explained in Section 3.2 of the Final EIR. It must be stressed that this methodology was utilized only with regard to the various physical factors--e.g., geologic, seismic, fire and flood hazard, agricultural land, mineral resources, etc., and only within urban development areas--urban densities might result in impacts anywhere within the areas mapped. It is acknowledged in the EIR that this type of analysis leads to an overstatement of potential impacts, but it was felt to be the best available approach, allowing a gross quantification of impacts.

Thus, the "worst case" used in the EIR represents an attempt to identify and quantify potential impacts within mapped urban expansion and infill areas on a gross basis. The land shown on the Land Use and General Development Policy Maps does not represent the "true" plan--mapped policy is only one dimension of the Proposed General Plan and cannot be considered in isolation. The reasons for the difference between the "demand" for land (based on the plan projections) and the "supply" shown on the plan maps are discussed in Appendix C of the Final EIR.

With regard to the translation of the various Section 6.0 categories (reflecting the "worst case" impact within new urban areas in terms of physical factors) into densities and persons affected, this would be completely incorrect and misleading. Again, the use of the "worst case" methodology in the EIR is not intended to imply that specific numbers of persons will be affected--this will depend upon where development occurs within the "supply" of land, the actual location of a hazard or resource as determined by more specific information, and the particular site design and any performance standards applied to the project.

The proposed density or land use type shown on the maps is mentioned in a general manner in Section 6.0 only where it is relevant to potential impacts or mitigation of specific factors, such as seismic or fire hazard. This information is not intended to correlate to specific numbers of persons.

1.4.15 Comment: The EIR must fully assess the impacts of 30,100 acres of new urban development in the Antelope Valley, as well as other sub-areas of the county.

Response: These comments have previously been responded to--see pages 14-15 and 14-16 of the Final EIR. Section 6.0 includes an assessment of the impacts of potential urban development in the Antelope Valley, as well as other planning areas of the county. The discussion of impacts is provided on a factor-by-factor basis--e.g., acreage of potential urban expansion and infill development subject to geologic hazards, fire hazard, flood hazard, etc. A cumulative discussion is also provided in Section 7.0 by planning area. With reference to the acreage of mapped urban expansion, the plan's implementation chapter includes a description of infill and expansion priorities, and a recommended

action to enact an ordinance to establish a set of clearly articulated criteria for new development within urban expansion areas to insure that it will occur in a manner consistent with plan policies and will pay for the marginal costs that it generates (see Pages VIII-19 through 21 of the plan). A discussion of a development qualification procedure has also been added as Technical Supplement D-2 of the Proposed General Plan.

1.4.16 Comment: The increase in VMT caused by excessive population and sprawl-inducing land use allocations along with clusters of congestion and the changes that will flow from local plans, will cause travel patterns to shift. The EIR must measure and prepare for this shift.

Response: This comment has previously been addressed--see page 14-41 of the Final EIR (reference is made to the response at the top of page 14-37 in the Final EIR).

1.4.17 Comment: The impacts of the implied assumption in the Transportation Element that the automobile will remain the key transportation mode must be assessed.

Response: This comment has been previously addressed. See response to comment # 2 on page 14-40 of the Final EIR.

1.4.18 Comment: The EIR does not adequately address the environmental impacts of the automobile in terms of land use questions, air quality, and noise and safety issues, nor does the EIR offer sufficient mitigation measures nor address alternative transportation options in sufficient detail.

Response: This comment has already been addressed. See response # 2 on page 14-40 of the Final EIR.

1.4.19 Comment: The EIR does not address the environmental problems that can occur when trip behavior is altered by land use changes.

Response: This comment has already been addressed. See response # 3 on page 14-41 of the Final EIR.

1.4.20 Comment: Changes in the Proposed General Plan in terms of urban expansion and rural development are not reflected in the Transportation Element and thus are not covered by the EIR. The protection of agricultural areas, open space areas, SEAs, hillsides and other sensitive lands from the growth-inducing impacts of roads and highways must be included in the EIR. What is the impact of roads to serve urban expansion areas especially in hillside areas where hillside management regulations do not apply?

Response: See response to comment # 4 on page 14-41 of the Final EIR. Also see the response to comment # 1.3.4 in this Supplement, dealing with the changes in the roadway system--the extent of roadways within urban areas has been reduced.

1.4.21 Comment: The EIR must reflect the alternatives that flow from the communications impact on transportation.

Response: See the response to comment # 6 on page 14-42 of the Final EIR.

1.4.22 Comment: The EIR must deal with the growth-inducing impacts of water and waste facilities related directly to the overage of population and land use allocations in the Proposed General Plan.

Response: The Final EIR discusses growth-inducement in Section 13.0. The plan and its monitoring provisions are designed to meet the projected needs of the anticipated population for water and

waste and other facilities, while also monitoring the cumulative impacts on the environment. The provision of water and waste and other facilities will be based on the plan's projected population increase (as monitored in the future) rather than on the mapped supply of urban expansion land shown on the General Development Policy Map. As explained in the response to comment # 1.3.17 as well as 1.4.14 in this Supplement, using only the mapped "supply" of land to determine where and how future development will take place is completely inappropriate. Appendix C of the Final EIR discusses the limitations of the "overage" concept.

1.4.23 Comment: The Land Use Element's Table 3.4 shows 15,300 industrial acres projected, but the Land Use Policy Map probably has 28,000 to 32,000 acres mapped. This inconsistency must be clarified in the general plan and EIR.

Response: This comment probably refers to the additional projected and mapped industrial land use. Table 3.4 reflects the plan's projected need for industrial acreage, while the Land Use Policy Map reflects areas suitable for industrial development. The reasons for the differences between the "demand" and "supply" acreage figures are discussed in Appendix C in the Final EIR with regard to the five planning areas where significant conversion of vacant lands to urban use is anticipated.

1.4.24 Comment: The EIR can address the question of how well the implementation measures in the plan's Implementation Chapter will reduce the impacts of various Proposed General Plan proposals.

Response: As explained in Section 3.2 of the Final EIR, all of the recommended actions in the Implementation Chapter have been reviewed with reference to potential impacts. As has been indicated (see also response to comment #1.4.30 of the "Coalition"), the plan's recom-

mended actions are, for the most part, identified as mitigating measures although potential adverse effects are discussed where identified. Where the mitigation measures cannot reduce the effects to insignificant levels, significant effects are identified in Section 7.0 of the Final EIR, and are further discussed in Section 3.0 of this Supplement (the Statement of Overriding Considerations).

1.4.25 Comment: Why has the EIR not measured the impacts of major new urban centers in fringe areas?

Response: The Final EIR has measured the impacts of potential new urban development, including that in new centers. The discussion by individual factor--e.g., geologic/seismic hazard, agricultural resources, etc.--in Section 6.0 includes any acreage located in new urban centers (as part of the overall urban expansion acreage) affected by hazards or affecting natural resources. In addition, those portions of Section 6.0 dealing with noise, air quality, governmental expenditures and energy consumption make reference to impacts or mitigating aspects of urban centers development.

1.4.26 Comment: Did the EIR measure the "worst case" impacts of 12,800 new acres of commercial development and 29,000 acres of industrial development? Where can the mapped data be found in the EIR?

Response: The Final EIR assumed the "worst case" development of all urban expansion shown on the General Development and Land Use Policy Maps, based only on mapped policy. The figures for urban expansion and infill development given for each of the "physical" factors (e.g., slope instability, agricultural resources) include all of the commercial and industrial development shown on the map. It is again important to emphasize that all of this acreage is not

expected to be developed, given the plan's textual policies and performance standards. Although information by land use type, and maps, are not provided for each planning area, (due to the scale of the plan and the potential data limitations), the type of land use potentially affected by a hazard or affecting a physical resource is pointed out when relevant to the degree of an effect or when used as a mitigation measure.

1.4.27 Comment: The EIR must calculate acreage by land use categories and measure the impacts of urban expansion resulting from the change from a 15 percent slope to a 25 percent slope.

Response: The change in the hillside management designation from lands beginning at 15 percent slope to those beginning at 25 percent slope does not represent a significant change. There are approximately 597,000 acres of non-urban hillsides of 15 percent or greater slope in the county. The estimated 107,000 acres of 15-30 percent slope represent a "worst case" removal of approximately 18 percent of the total 597,000 acres of non-urban hill-sides of 15 percent or greater slope from the hillside management designation (the 15-25 percent category would represent even a lesser amount). This is not a significant portion of the total acreage involved, especially when it is remembered that the acreage removed from the hillside management designation would remain subject to a density of one unit per five acres permitted in non-urban areas (with a maximum of one unit per acre permitted in non-sensitive areas meeting certain conditions). This should be compared to the one unit per two acres permitted on lands of 15-25 percent slope under the hillside management provisions of the Preliminary Plan. And, the 25-30 percent acreage is now subject to a two acre minimum lot size per dwelling unit, as compared to a one acre minimum permitted under certain conditions in the Preliminary Plan.

With reference to urban hillsides, the acreage included in the 15-30 percent category represents less than 14 percent of the total 8,000 acres of urban expansion shown on the plan maps (more specifically, 1,100 acres are included in the 15-30 percent category, so the acreage of 15-25 percent lands would be a smaller figure. Also, in Section 3.0 of the Final EIR, it is explained that it is the factors associated with slope (e.g., fire hazard, slope stability, scenic qualities) that are considered in the EIR in terms of potential effects. The effects of potential urban development in terms of each of these factors are considered in the EIR, and where they are not mitigated to insignificant levels by the various mitigation measures proposed (including hillside management beginning at 25 percent slopes), they are identified as potentially significant in Section 7.0 of the Final EIR.

1.4.28 Comment: The EIR does not disclose, justify or measure the impacts of the differences in SEAs on the 1979 General Development Policy Map and the SEAs as proposed in the Land Suitability/Capability study by ESRI.

Response: The Final EIR--Section 6.8--discusses biota in general, and more specifically SEAs, in terms of the impact of the plan and mitigation measures for these impacts. While it does not discuss the specific recommendations of the ESRI consultants regarding SEAs, these recommendations are discussed in Appendix I to this Supplement.

With regard to the adjustments made to the SEA boundaries proposed by the consultants (ESRI), minor changes were made, as reflected in the Proposed Plan. A net reduction of 2,310 acres--approximately one percent of the original 213,000 acres--was made. These changes, which were determined not to be significant, were based on the

following: (1) existing development pattern represented substantial intrusion into SEA; (2) existence of legally binding cemetery permits; (3) in need of substantial restoration, reclassified as open space; (4) more detailed biotic studies carried out by cities or for city plans indicated the identified area did not include significant ecological resources; (5) presence of existing development or substantial development commitments; (6) areas re-evaluated by recognized environmental authorities and recommended for reclassification. In addition, 6,010 acres identified as Habitat Management Areas by the North County planning program, and as Areas of Botanical Significance for Santa Catalina Island were integrated into the SEA concept. Detailed reports on these changes are available in the Open Space/Conservation Section at the main office of the Department of Regional Planning.

1.4.29 Comment: The EIR is deficient in Sections 11, 12, and 13. It is improper to use figure 13-1 when the EIR states it has used a "worst case" analysis based on different data.

Response: It is felt that Sections 11.0, 12.0, and 13.0 meet the intent of CEQA and the State and County EIR Guidelines. With reference to the figures in Table 13.0, as has been previously pointed out in section 3.2 of the Final EIR, it is only in the case of the various physical factors-- e.g., geologic, fire, flood hazard, agricultural land, mineral resources--that the "worst case" analysis was used to measure potential impacts.

As explained in the response to comment # 1.4.14 (included in this Supplement), this methodology, which avoids speculation, was used because urban density development might result in impacts (in terms of hazards or resources) anywhere within the areas mapped. Since this approach is explained under the Methodology Section in the Final EIR, it is not reiterated in section 13.0, although refer-

ence is made in that section to Appendix C which deals with the question of the supply of land shown on the map as opposed to the projected demand. Since Figure 13-1 does accurately reflect the projections on which the plan is based, it is felt to be properly included in Section 13.0.

1.4.30. Comment: The EIR proposes general plan policies as mitigation measures when in fact they cause impacts.

Response: Each of the plan's policies and recommended actions was evaluated during the initial study process as to potential positive or negative effects. Potential negative significant effects were mentioned in the Final EIR. Since the "worst case" approach was used to identify the impacts of the plan's potential urban development as shown on mapped policy, written policies were utilized as mitigation measures to help reduce the "worst case" impact. Written policies will function along with mapped policies, as specific land use decisions are made. In the case of recommended actions, since these are more specific than the plan's policies, it is possible to identify more specific adverse and well as mitigative aspects associated with the action programs. This is especially important in the case of performance standards and development qualification.

1.4.31 Comment: The EIR implies that it is the responsibility of other agencies and levels of government to mitigate the impacts of County/Regional Planning Commission land use actions.

Response: It is not clear what portion of the EIR is being addressed, but the Final EIR did not make this implication. Other agencies and jurisdictions are mentioned in the discussion of mitigation measures in certain portions of the Final EIR when there are specific programs or regulations which will or may help

to reduce an impact of the plan. For example, AQMP is discussed in the Air Quality section (Section 6.6) and the State Energy Resources Conservation and Development Commission and the various utility companies are mentioned in the discussion of energy (Section 6.11). The Introduction to the Implementation Chapter of the Proposed Plan discusses the methods other levels of government may utilize to participate in or assist in carrying out the plan.

1.4.32 Comment: The EIR must measure the impact of the overage of small lots and fragmentation of land ownership on the conservation and open space lands proposed by the general plan.

Response: The Proposed General Plan sets forth an action program to determine the scope and nature of small lot impacts. The potential impacts of small lot development vary throughout the county, from consumption of valuable agricultural land in the North County to affecting road capacity, water quality, and the natural environment in the Santa Monica Mountains. The plan includes action programs dealing with evaluating the development implications of legal lots of record in the unincorporated area (# 12 of Land Use Element) and reviewing alternative programs designed to insure that development of existing, sub-standard lots will not result in loss of significant natural resources (#13 of Land Use Element). In addition, recommended actions dealing with Transfer of Development Rights as a possible means of implementing general plan policies on the conservation of agriculture and open space lands and establishing redevelopment agency powers have been added to the Proposed Plan subsequent to the Board of Supervisors' hearings. These recommended actions represent methods of addressing small lot impacts. Furthermore, the plan does not preclude other innovative approaches from being implemented in the future.

1.4.33 Comment: The origin and accuracy of Table 2.3 in the general plan must be fully documented in the EIR.

Response: This table is being revised to indicate that the figures were derived by Department of Regional Planning staff from the ESRI grid cell map. The figures given represent the best available data. (See Appendix D of the Final EIR--"Data Reliability.")

1.5. Cox, Castle and Nicholson, et al

1.5.1 Comment: Subsequent to the completion of the Final EIR, the Board of Supervisors has received oral testimony raising issues to which the county should respond or presenting facts that the county should consider or address. The Board of Supervisors should return the March EIR to the Regional Planning Commission and offer another opportunity for public comment.

Response: While there is no CEQA-related requirement to recirculate the Draft EIR or Final EIR for further comment, the Board of Supervisors has returned the plan to the RPC to allow consideration of several Board motions and allow the RPC to make a determination as to whether further public comment is appropriate.

1.5.2 Comment: The proposed general plan in discussing hillsides refers to a slope of 25 percent while the March EIR uses both a 25 percent slope and a 30 percent slope in different discussions.

Response: A discussion of the change in the slope density categories, and of how slope is discussed in the EIR, is included in the response to comment # 1.4.27 by the Coalition for Los Angeles Planning in the Public Interest.

1.5.3 Comment: The Board of Supervisors should take the steps necessary to: (1) address in the EIR those matters on which members of the public testified requiring modification, etc; (2) identify all changes in the General Plan after the date of the March EIR to address their environmental effects; and (3) ascertain through public comment whether any other matters in the March EIR are viewed as being inadequate.

Response: With reference to the changes made in the plan prior to the time of the Board of Supervisors hearing, these have been addressed in the Final EIR. Issues brought up at the public hearing before the Board or submitted as written testimony are being addressed in this Supplement.

1.6. Mary Ann Graeter

1.6.1 Comment: The EIR is deficient in considering financing and economic impacts resulting from downzoning.

Response: A generalized discussion of adverse effects on property owners in terms of the placing of restrictions on individual parcels of land is included in Section 6.20 ("Investment") of the Final EIR. Given the broad level of the plan, and the extremely conjectural nature of this issue, the discussion in the Final EIR is adequate. This is not considered to be a significant environmental issue.

1.7. Hill, Farrer and Burrill

1.7.1 Comment: The EIR is deficient, particularly with respect to the "Summa" property. There is no adequate assessment of land uses or alternatives to land uses in terms of environmental, economic, or sociological effects. This also relates to the

SEA designation of the property.

Response: It is felt that the EIR adequately addresses the potential effects of the plan, including physical, economic, and social aspects, in Section 6.0. As explained previously, effects are addressed on a planning area and city/community level (not at a site level) given the scale and scope of the plan. Alternatives to the plan as a whole are addressed in Section 10.0. Specific environmental effects and alternatives related to the "Summa" property will be reviewed should a specific project be presented for review.

1.8. Dick Wirth

1.8.1 Comment: Hillside Management is discussed in the EIR in terms of 15 and 30 percent slope, and in the General Plan in terms of 25 percent slope.

Response: The change from a 15 percent slope threshold to a 25 percent slope threshold, and the manner in which slope was discussed in the EIR, is addressed in the response to comment #1.4.27 of the Coalition for Los Angeles County Planning in the Public Interest, included in this Supplement.

SECTION 2.0

ENVIRONMENTAL ANALYSIS OF CHANGES TO THE PROPOSED GENERAL PLAN

SECTION 2.0 ENVIRONMENTAL ANALYSIS OF CHANGES TO THE PROPOSED GENERAL PLAN

Thirty-five Board of Supervisors' motions relating to changes in the Proposed Plan were considered by the Regional Planning Commission. Those recommended responses approved by the Commission would result in changes to various textual policies, mapped policies and/or action programs if approved by the Board. In those cases where a textual change was minor, such as clarifying language, no new Initial Study impact matrix was prepared--the impacts identified in the original matrix prepared for the policy or recommended action would continue to be appropriate. However, an impact matrix was prepared where a policy or recommended action was added to the Proposed Plan or where a substantial revision was made. Most of the impact matrices prepared did not identify any potential adverse effects on the environment.

A limited number of the Initial Study impact matrices prepared for the revisions or additions to the Proposed Plan identified potential adverse effects. These changes or additions, and their adverse effects, are discussed below, by policy or recommended action number.

2.1. Textual Changes

2.1.1 Plan Policies

- a. Revision of Conservation and Open Space Element, #7: "Protect the quality of the coastal environment. Maximize public access to and along the coast and maximize public recreational opportunities in the coastal zone consistent with sound resource conservation principles". (Reference is made to Board of Supervisors' motion on countywide boating policies.)

-----Potential adverse impacts on the natural environment (coastal resources) and environmental quality (additional

noise, traffic congestion, air pollution) were identified. However, these are considered to be insignificant, since (1) increased access is to be permitted only where consistent with resource conservation, and (2) the Transportation Element includes policies and recommended actions dealing with reducing traffic congestion in beach areas.

2.1.2 Recommended Actions (As included in Implementation Chapter)

- a. Revision of Transportation Element, # 27: "Develop a coordinated parking management plan, including provision for off-street parking in high activity centers such as central business districts, places of public assembly, and congested beach areas, and restrictions on street parking on heavily travelled routes during peak periods, while maintaining a balance between circulation and curb parking needs." (Reference is made to the Board of Supervisors' motion on policies for alleviating beach congestion.)

----An adverse effect on fiscal costs was identified, associated with the costs of developing and implementing a parking management plan. However, this potential impact is considered to be short term and not significant. In the long run, reduced energy consumption and air emissions could be expected, due to reduced traffic congestion.

- b. Revision of Transportation Element, #42 "Study the feasibility of auto control zones in high activity centers such as central business districts, places of public assembly, and congested beach areas." (Reference is made to the Board of Supervisors' motion on policies for alleviating beach congestion.)

----An adverse effect on the local economy was identified, associated with the anticipated short-term loss of income to businesses in areas where the use of autos is

restricted. However, this potential impact could be expected to be reversed in the longer term, as adjustments are made. Reduced energy consumption and air emissions would be associated with the reduced traffic congestion in high activity centers.

- c. Addition of Recommended Action # 16, Land Use Element: "Investigate exercising the community redevelopment authority in addressing and resolving the substandard subdivision problem which would include the identification of candidate redevelopment areas and preparation of specific redevelopment plans." (Reference is made to Board of Supervisors' motion on redevelopment applied to substandard lots.)

-----A potential adverse short-term effect on fiscal costs was identified, due to the substantial initial costs of implementing the redevelopment option--the use of governmental funds to acquire substandard lots. However, a long-run savings (eliminating poor design and service problems) would result.

2.1.3 General Conditions and Standards of Development

- a. Revision of Appendix A of the Land Use Element to clarify the distinctions between urban and non-urban hillside development standards, to more specifically define the area/community plan options which may be applied at the local level and to modify, where necessary, the urban hillside management provisions to allow residential development to occur consistent with the densities prescribed in the Proposed General Plan or applicable area/community plan. (Reference is made to Board of Supervisors' motion on clarification of urban/non-urban hillside policies.)

----A short-term effect on the natural environment was identified, associated with development in urban hillsides. This reflects the anticipated impact of landform alterations, given the urban densities shown on the Land Use Policy Map in urban hillsides. While the Hillside Management procedure is discussed in the EIR primarily as a mitigation measure, it is recognized that development in urban hillsides will result in some adverse impacts, particularly on scenic qualities (as discussed in Section 6.13 of the Final EIR). Major mitigation measures for this potential impact are the requirements for landscaping and that 50 percent of the site be maintained in a natural or open condition.

Urban hillside development also has a potential for adverse impacts in terms of geologic/soils hazards, although it is assumed that these types of impacts will be mitigated through engineering solutions, as a part of the design review process. Each of the potential effects of urban development (including such development within hillsides) is discussed in Section 6.0 of the Final EIR. No additional impacts would be created by this revision of the Hillside Management Performance Review Procedure.

- b. Addition of language to the General Conditions and Standards of Development section of the Proposed Plan's Land Use Element dealing with establishment of non-industrial uses in identified Major Industrial areas, not covered by a more detailed areawide or community plan, subject to certain conditions. (Reference is made to the Board of Supervisors' motion on residential uses in industrial areas).

----Potential adverse effects on environmental quality (e.g., noise, air pollution) and urban form and pattern were identified, based on the potential incompatibilities between residential and industrial uses. However, residential uses are proposed to be permitted only where compatibility is assured through specific site plan review and approval. It must be determined that the proposed use demonstrates a desirable, compatible and well-integrated pattern of employment and housing opportunities. Thus, potential effects would be addressed through specific site review. This change in the Proposed Plan is not considered to be significant.

2.2. Mapped Policy Changes

2.2.1 Revision of Transportation Policy Map to provide an extension to the transitway system on the San Bernardino, Ventura, Santa Ana, San Gabriel River and Harbor Freeway Corridors. (Reference is made to Board of Supervisors' motion on countywide rapid transit.)

----An adverse effect on fiscal resources was identified, as the costs of constructing a transitway system would be substantial. However, it is assumed that most of the necessary funds would be obtained from the federal and state governments, thus minimizing the effect on local sources of revenue. As is indicated in Section 6.21 of the Final EIR, a more efficient transportation system is expected to improve the economy and efficiency of the County's urban development pattern, so that an overall positive impact would be expected.

2.2.2 Revision of Special Management Areas Policy Map to modify the boundary of SEA #15 (Tonner Canyon/Chino Hills). (Reference is made to Board of Supervisors' motion on Tonner Canyon SEA.)

----A potential adverse effect on the natural environment (biota) was identified. The total acreage within SEA # 15 is 4,150 acres. The 22 acres in site "A" removed from the SEA designation have been classified as urban residential. While this change has the potential to affect the biotic resources--in particular the lower canyon areas which contain the major vegetation and drainage features, there is professional disagreement as to the biotic importance of the site. In addition, the development of the site will be subject to the Hillside Management Performance Review Procedure for urban hillsides and it will be possible to design a project to be located below the ridgelines, clustering development in areas already somewhat disturbed. It is important to note that the acreage removed from the SEA has freeway and highway access, with water, sewers and utilities available. Thus, it is concluded that this change will not result in any significant effects.

With regard to site "B", 280 acres have been removed from the SEA designation and reclassified as non-urban. While this change has the potential to result in adverse effects on the biotic resources, the non-urban and hillside management designations will help to protect the resources, as will the environmental analysis required for this site, dealing with the SEA resources. A specific site development has been proposed for the acreage which would preserve 80 percent of the site in its natural state. The County Nature Center has suggested a series of mitigating measures to reduce the effect on the biotic resources. It will be possible

to require that a project be designed so as to minimize the impact on the biotic resources. It is therefore maintained that while this change does represent a negative impact on the resources of this area, it does not represent a significant adverse impact in terms of the Proposed General Plan's effects on biota. The integrity of the SEA can be maintained.

2.2.3 Revision of Special Management Areas Policy Map to remove three sites (a total of 70 acres) from SEA #15 (Tonner Canyon). (Reference is made to the Board of Supervisors motion on editorial changes.)

-----A potentially adverse effect on the natural environment (biota) was identified. However, this change acknowledges the existence of urban development within the area affected. The 70 acres have been reclassified as Hillside Management. Therefore it is concluded that there will be no significant adverse effect on the environment.

2.2.4 Revision of Special Management Areas Policy Map to redraw the boundary of SEA #16 (Buzzard Peak/San Jose hills) northerly of Buzzard Peak. (Reference is made to Board of Supervisors' motion on Buzzard Peak SEA.)

-----A potential adverse effect on the natural environment (biota) was identified. The 200 acres removed from the total 740 acres within the SEA have been classified as non-urban. Thus, any development would be subject to the Hillside Management Performance Review Procedure as well as the requirement for all non-urban development that any proposed use will not "degrade significant natural resources

such as sensitive habitat areas, riparian woodlands, and scenic vistas" (Land Use Element, page III-36). In addition, portions of the affected acreage have already been disturbed. It is also important to point out that the southerly half of the acreage removed from the SEA designation, located in the city of Walnut, is designated for non-urban hillside development in the adopted Walnut General Plan. Development of the city acreage, as is planned, would preclude maintenance of the SEA's integrity within the unincorporated northern extreme of the SEA. Also, the City of Walnut has designated about 120 acres within the remaining SEA as a "natural park area"--this acreage, according to all reports, is the most critical to protect, given the vegetative resources and drainage features.

Development proposals for the portions of the SEA to be deleted have been submitted to the county and the City of Walnut. The EIR's for these proposals evaluate the biotic resources in more detail. Therefore, given these circumstances as well as the countywide scale of the Proposed Plan, it is concluded that this change will not result in a significant effect.

2.2.5 Revision of General Development Policy Map (and other plan policy maps as appropriate for consistency) to change 500 acres of land in the East San Gabriel Valley planning area from Non-Urban and Hillside Management to Urban Expansion, 100 acres in the Malibu/Santa Monica Mountains planning area from Non-Urban to Urban Expansion, and 5,100 acres from Urban Expansion to Agriculture and other Non-Urban in the Antelope Valley planning area. (Reference is made to the Board of Supervisors' motions on the

Northeast Diamond Bar area, the Kenicott property, et. al., the review of the Malibu/Santa Monica Mountains Plan, and editorial changes.)

----A potential adverse effect on the natural environment (biota), as well as noise and land use compatibility impacts, were identified with the change in the East San Gabriel Valley acreage. Potential noise and land use compatibility effects were identified as associated with the 200 acres changed from non-urban to urban expansion in the Diamond Bar area north of the Pomona and Orange Freeways and south of the City of Industry. However, these potential impacts can be mitigated at the project level through site design, and are not significant at the scale of the Proposed General Plan.

Other potential impacts associated with these changes in mapped policy are reflected in Figure 2-1. For each of the three planning areas affected, the additional acreage associated with the various hazards/resources (as identified and discussed in Section 6.0 of the Final EIR) is presented. In order to allow a comparison with the figures given in the Final EIR for these same environmental factors, Figure 2-2 presents the total acreage of potential mapped urban expansion, including the additional urban expansion shown in Figure 2-1 above, for the three planning areas affected.

As noted in Figure 2-1, an additional 300 acres of Class "E" land (land identified by ESRI as having a very low capability for urban development) have been added to the urban expansion category. This acreage is located in the Antelope Valley in the City of Lancaster and is subject to flood hazard. However, this potential hazard would be mitigated as a part of the urban-

ization process. No "D" lands (lands classified by ESRI as having a low capability for urban development) are affected by the additional urban expansion acreage.

The figures presented in Figure 2-1 are provided for informational purposes. However, this additional urban expansion acreage added to the General Development Policy Map does not result in any change in terms of the identification of significant environmental effects of the Proposed Plan, as discussed in Section 7.0 of the Final EIR and further discussed in Section 3.0 of this Supplement. It is important to emphasize that the plan's Land Use and General Development Policy Maps do not suggest or recommend that all of the acreage shown as urban expansion be developed.

Appendix C of the Final EIR is also affected by the modification of mapped urban expansion acreage in the East San Gabriel Valley, Malibu/Santa Monica Mountains and Antelope Valley planning areas. The attached tables (titled "Analysis of Urban Land Demand/Supply") and related textual analysis are revisions to those pages that appear in Appendix "C" of the Final EIR. Underlined material indicates additions, and material with dash lines indicates deletions. The net acreage changes for allocated urban expansion for the three Planning Areas are:

East San Gabriel Valley	+500
Malibu/Santa Monica Mountains	+100
Antelope Valley	<u>-5,100</u>
Total Net Change	-4,500

It should be noted that the added urban expansion acreage in the East San Gabriel Valley and Malibu/Santa Monica Mountains

Planning Areas reflects higher density residential areas adjacent to or near existing urban development. The net decrease in the Antelope Valley changes primarily represent the City of Lancaster's General Plan which substantially reduces residential densities on its periphery and increases densities within and near the City's core area. Thus, both the additions and deletions are consistent with the County General Plan policies of promoting a more concentrated urban pattern and focusing new development in suitable locations.

FIGURE 2 - 1

ADDITIONAL MAPPED URBAN EXPANSION ACREAGE RECOMMENDED
TO BE ADDED TO THE PROPOSED GENERAL PLAN*

<u>Environmental Factor</u>	<u>East San Gabriel Valley Planning Area</u>	<u>Malibu/Santa Monica Mtns. Planning Area</u>	<u>Antelope Valley Planning Area</u>
Seismic Hazard	0	**	0
Liquefaction Hazard	0	0	0
Slope Instability Hazard	+400	**	0
Soils Constraints	+300	**	0
High Flood/Mudflow Hazard	0	**	+300
High Fire Hazard	0	**	0
Aquifer Recharge Areas	**	0	0
Vegetative Types			
Coastal Sage Scrub	0	**	**
Chaparral	**	**	**
Grassland	+100	0	**
Woodland/Savannah	0	**	+100
Extractive Resources	0	0	0
Existing Agriculture	+100	**	0
Prime Agricultural	0	**	-4,700
Soils Resources			
Scenic Qualities			
Areas of 15-30% Slope	+200		0
Areas of above 30% Slope	**	**	
Areas of High Scenic Quality	+100	0	0
"D" Lands	0	**	0
"E" Lands	0	0	+300

*This acreage has been added as a result of Regional Planning Commission recommendations to the Board of Supervisors on several Board motions, as identified in the text. The Land Use Policy Map and other plan maps are also modified appropriately for consistency.

**Less than 100 acres

FIGURE 2 - 2

ESTIMATED MAPPED URBAN EXPANSION ACREAGE ASSOCIATED WITH
 HAZARDS/RESOURCE FACTORS IN THE EAST SAN GABRIEL,
 MALIBU/SANTA MONICA MOUNTAINS, AND ANTELOPE VALLEY

PLANNING AREAS

<u>Environmental Factor</u>	<u>East San Gabriel Valley Planning Area</u>	<u>Malibu/Santa Monica Mtns. Planning Area</u>	<u>Antelope Valley Planning Area</u>
Seismic Hazard	100	100	400
Liquefaction Hazard	3,100	800	500
Slope Instability Hazard	4,400	1,200	100
Soils Constraints	3,300	1,800	2,200
High Flood/Mudflow Hazard	*	200	3,100
High Fire Hazard	500	400	0
Aquifer Recharge Areas	1,900	100	400
Vegetative Types			
Coastal Sage Scrub	200	800	300
Chaparral	1,600	300	0
Grassland	3,300	1,000	2,000
Woodland/Savannah	100	400	17,400
Extractive Resources	500	0	0
Existing Agriculture	3,700	*	3,900
Prime Agricultural Soils Resources	2,800	700	17,600
Scenic Qualities			
Areas of 15-30% Slope	2,300	400	100
Areas of above 30% Slope	2,700	1,200	0
Areas of High Scenic Quality	1,200	400	*
"D" Lands	800	400	0
"E" Lands	0	100	3,100

*Less than 100 acres

ANALYSIS OF URBAN LAND DEMAND/SUPPLY: East San Gabriel Valley
Planning Area

Allocated Urban Expansion by Use Type	Projected Land Demand by Use Type	Difference	Adjustment	Relationship
Low & Low/Medium Density Residential 8,800 8,300 acres 66% 69% within Incorporated Cities 34% 31% within Unincorporated Communities	Low Density Residential 4,600 acres (S.F. & Duplex)	 <u>+4,200</u> <u>+3,700</u> acres	Less 300 acres of public facilities	Allocated supply exceeds projected demand by <u>3,900</u> 3,400 acres - <u>85% 74%</u> over-allocation
Medium & High Density Residential 400 acres 25% within Incorporated Cities 75% within Unincorporated Communities	Medium Density Residential 400 acres (Mult. Res.)	0 acres	(none)	Allocated supply reflects projected demand
Major Commercial 800 acres 56% within Incorporated Cities 44% within Unincorporated Communities	Commercial 400 acres	<u>+400</u> acres	(none)	Allocated supply exceeds projected demand by 400 acres 100% over-allocation
Major Industrial 1,400 acres 100% within Incorporated Cities	Industrial 700 acres	<u>+700</u> acres	(none)	Allocated supply exceeds projected demand by 700 acres 100% over-allocation
Public & Semi-Public Facilities 0 acres	Public Services & Facilities 300 acres	-300	Unmapped public facilities allocated to lower density residential classification	Allocated supply reflects projected demand

ANALYSIS OF URBAN LAND DEMAND/SUPPLY: East San Gabriel Valley
Planning Area

Allocated Urban Expansion by Use Type	Projected Land Demand by Use Type	Difference	Adjustment	Relationship
Open Space	Urban Open Space 250 acres	-250 acres	Unmapped 250 acres of urban open space absorbed with urban residential, commercial, and industrial expansion areas.	Allocated supply reflects projected demand
All Urban Expansion Lands Allocated <u>11,400</u> 10,900 acres 67% 70% within Incorporated Cities 33% 30% within Unincorporated Communities	Projected demand for new urban land 6,700 acres	+4,700 acres	+4,200 N/A	Allocated supply exceeds projected demand by <u>4,700</u> 4,200 acres 70% 63% over-allocation

*All figures rounded to nearest 50 acres.

**Totals may not add correctly due to rounding.

FACTORS INFLUENCING DEMAND/SUPPLY RELATIONSHIP: East San Gabriel Valley Planning Area

As indicated by the preceding analysis, ~~70%~~ 67% of the total ~~10,900~~
11,400 acres of allocated urban expansion land in East San Gabriel Valley is located within incorporated jurisdictions. These lands are designated for future urban growth by adopted city plans covering the areas in question, and in keeping with the Regional Planning Commission's position regarding 'sensitivity' toward locally adopted plans, have been similarly reflected by the proposed countywide General Plan.

With regard to urban expansion lands allocated within unincorporated areas (totaling approximately ~~3,300~~ 3,800 acres), almost all are located within the communities of Hacienda Heights, Rowland Heights, and Diamond Bar. On reviewing the distribution of such urban expansion areas, as reflected on Plan policy maps, it is apparent that the allocated acreage is comprised of lands physically suitable for urban use, surrounded by or immediately adjacent to existing urban development. In addition, much of the allocated area has been committed to urban use by adopted and proposed community plans and previously approved development permits.

The allocation of urban expansion lands within the East San Gabriel Valley Planning Area is in keeping with the general principles as stated in the discussion of urban expansion areas (General Goals and Policies Chapter, Pg. 51);

"The general intent is to delineate major areas within which the process of urban development may take place; to direct development toward areas having appropriate services or where it is most feasible to extend necessary

services; to direct urban growth away from areas with severe potential hazards to the health and welfare of the public; and to protect areas exhibiting high environmental sensitivity to intensive urban development.

Within the framework of population allocations, the expansion areas were defined by use of the following criteria: areas committed for urban development and planned for urban use in the near future including areas shown on city and community plans; areas with existing or programmed services or in close proximity to existing urban areas and service systems; and, unincorporated land suitable for urban use, i.e., without major hazards or significant natural resources."

The allocation of urban expansion lands is further supported by sub-regional growth and development policies specifically addressing the East San Gabriel Valley Planning Area (General Goals and Policies Chapter, Pg. 27). These include the following.

15. Encourage the development of new regional centers in the Diamond Bar and the Glendora/San Dimas areas.
16. Encourage the development of an expanded economic base in the East San Gabriel Valley to provide more jobs within convenient commuting range of residential areas.
17. Focus new urban growth on the most suitable lands near existing urban areas and into by-passed vacant land within the eastern and southern parts of the planning area.

ANALYSIS OF URBAN LAND DEMAND/SUPPLY: Malibu/Santa Monica Mountains Planning Area

Allocated Urban Expansion by Use Type	Projected Land Demand by Use Type	Difference	Adjustment	Relationship
Low & Low/Medium Density Residential <u>2,500</u> 2,400 acres	Low Density Residential 2,200 acres	+300 +200 acres	Less 200 acres of Public Services & Facilities	Allocated supply exceeds reflects projected demand by 100 acres <u>5% over-allocation</u>
Medium & High Density Residential 100 acres	Medium Density Residential 100 acres	0 acres	(none)	Allocated supply reflects projected demand
Major Commercial 600 acres	Commercial 300 acres	+300 acres	Less 250 acres of commercial recreation facilities associated with national recreation area and coastal rec resources	Allocated supply exceeds projected demand by 50 acres <u>17% over-allocation</u>
Major Industrial 300 acres	Industrial 100 acres	+200 acres	(none)	Allocated supply exceeds projected demand by 200 acres <u>200% over-allocation</u>
Public & Semi-Public Facilities 0 acres	Public Services & Facilities 200 acres	-200 acres	Unmapped public & semi-public facilities allocated to lower density residential areas	Allocated supply reflects projected demand
Open Space 350 acres	Urban Open Space 700 acres	-350 acres	Unmapped 350 acres of open space absorbed within urban residential, commercial and industrial expansion areas	Allocated supply reflects projected demand

ANALYSIS OF URBAN LAND DEMAND/SUPPLY: Malibu/Santa Monica Mountains
Planning Area

Allocated Urban Expansion by Use Type	Projected Land Demand by Use Type	Difference	Adjustment	Relationship
All Urban Expansion Lands Allocated	Projected Demand for New Urban Land		Urban expansion acreage does not include 350 acres of unmapped urban open space	Allocated supply exceeds project demand by <u>250</u> 150 acres
<u>3,500</u> 3,400 acres	3,600 acres	-100 -200 acres		7% 4% over allocation
(Totally within unincorporated area)				
100% within unincorporated communities				

*All figures rounded to nearest 50 acres.

**Totals may not add correctly due to rounding.

FACTORS INFLUENCING DEMAND/SUPPLY RELATIONSHIP: Malibu/Santa Monica Mountains Planning Area

As can be seen from the preceding analysis, the projected demand for, and allocated supply of future urban expansion areas in the Malibu/Santa Monica Mountains Planning Area reflect nearly a one-to-one relationship. The limited flexibility provided for future urban development within this Planning Area reflects its status as a significant regional open space and recreational resource area. Such regional resource values are illustrated by local, state and federal involvement in both the coastal Malibu and interior mountain areas.

The apparent imbalance between demand and supply of commercial expansion lands result from the inclusion of 250 acres proposed for commercial recreation use within the Major Commercial land use classification of the countywide Land Use Policy Map. Such commercial recreation areas, specifically delineated on the draft Malibu/Santa Monica Mountains Areawide General Plan, are accessory to and supportive of current and proposed recreation facilities, and are responsive to demands originating at both the local and regional levels. Demand for commercial lands reflected in the Plan's subregional land use projections, on the other hand, are based solely on commercial service needs resulting from projected population growth within the Planning Area.

The over-allocation of industrial lands involves relatively minimal acreage, and is associated with the growing Westlake industrial community. Such industrial lands are distributed in a manner consistent with subregional policies addressing resource preservation.

Finally, the apparent net deficiency in allocated urban expansion areas results from differences between mapping and projection methodologies. Specifically, future urban open space areas reflected on Plan policy maps are not included with urban expansion area acreage calculations. Projected demands for new urban expansion lands do however include urban open space figures. This discrepancy produces the apparent ~~200~~ 100-acre under-allocation.

In summary, the allocation of new urban expansion lands within the Malibu/Santa Monica Mountain Planning Area is consistent with Plan policies recognizing the area as a regional recreational and open space asset.

ANALYSIS OF URBAN LAND DEMAND/SUPPLY: Antelope Valley
Planning Area

Allocated Urban Expansion by Use Type	Projected Land Demand by Use Type	Difference	Adjustment	Relationship
Low & Low/Medium Density Residential <u>14,900</u> 19,200 acres 58% 67% within Incorporated Cities 42% 33% within Unincorporated Communities (Urb Res 1 & 2)	Low Density Residential 6,000 acres (S.F. & Duplex)	 $+8,900$ $+13,200$ acres	Less 500 acres of public services and facilities	Allocated supply exceeds projected demand by <u>8,400</u> 12,700 acres <u>140%</u> 211% over-allocation
Medium and High Density Residential <u>800</u> 700 acres 89% 86% within Incorporated Cities 11% 14% within Unincorporated Communities (Urb Res. 3 & 4 2)	Medium Density Residential 300 acres (Mult. Res)	 $+500$ $+400$ acres	Less-area-subject-to-phasing	Allocated supply exceeds projected demand by <u>500</u> 400 acres <u>167%</u> 133% over-allocation
Major Commercial <u>3,800</u> 3,200 acres 98% 97% within Incorporated Cities 2% 3% within Unincorporated Communities	Commercial 600 acres	 $+3,200$ $+2,600$ acres	Less-area-subject-to-phasing Includes approximately 1,300 acres within the "Diversified Center" classification of the Palmdale City Plan. This classification would permit mixed commercial, residential and public uses.	Allocated supply exceeds projected need by <u>3,200</u> 2,600 acres <u>533%</u> 433% over-allocation

ANALYSIS OF URBAN LAND DEMAND/SUPPLY: Antelope Valley
Planning Area

Allocated Urban Expansion by Use Type	Projected Land Demand by Use Type	Difference	Adjustment	Relationship
Major Industrial	Industrial			
<u>5,500</u> 7,000 acres 87% 90% within Incorporated Cities 13% 10% within Unincorporated Communities	1,400 acres	<u>4,100</u> 5,600 acres	Less-area-subject to-phasing	Allocated supply exceeds projected need demand by <u>4,100</u> 5,600 acres <u>293</u> 400 % over-allocation
Public & Semi Public Facilities <u>0</u> 17,300 acres (excluding airport) 100% 5% within Incorporated Cities 95%-within Incorporated Communities	Public Services & Facilities <u>500</u> 17,800 acres (excluding airport)	-500 acres	<u>17,300</u> -acres-allocated-to-proposed Palmdale-Airport-Additional 500 acres (unmapped) allocated to lower density residential classifications	Allocated supply reflects projected demand
Open Space 0 acres	Urban Open Space 300	-300 acres	Unmapped 300 acres of urban open space absorbed within urban residential, commercial, and industrial expansion areas	Allocated supply reflects projected demand
All urban expansion area unallocated <u>25,000</u> 39,100 acres (excluding airport) 71% 76% within Incorporated Cities 29% 24% within Unincorporated Communities	Projected Demand for new urban land 9,100 acres (excluding airport)	<u>+15,900</u> +21,000 acres	N/A	Allocated supply exceeds projected demand by <u>15,900</u> 21,000 acres <u>175</u> 231 % over-allocation (excluding airport)

*All figures rounded to nearest 50 acres.

**Totals may not add correctly due to rounding.

FACTORS INFLUENCING DEMAND/SUPPLY RELATIONSHIP: Antelope Valley
Planning Area

As indicated by the above analysis, both projected growth levels, and the allocated supply of land suitable for urbanization are-greatest-, exceeds projected growth in the Antelope Valley Planning Area. Demand projections respond to Plan policies, at both the countywide and local levels, supporting development of an autonomous urban area in the Antelope Valley, concomitant with the proposed development of a major regional airport at Palmdale. Specific policies in this regard include the following.

55. Promote the development of an autonomous urban area with an expanded and diversified economic base that will minimize the need for long distance commuting to southern Los Angeles County.
56. Encourage the development of new regional centers, as needed, in Lancaster and Palmdale.
57. Support the efforts of the City of Los Angeles to develop a commercial airport at Palmdale.

(Proposed countywide General Plan, General Goals and Policies Chapter, Pg. 30)

- 1.1 Accommodate 2000 population and land use demand as projected for the Antelope Valley designating sufficient area for appropriate use and a "reasonable" excess to provide adequate flexibility.
- 1.2 Closely monitor growth in the Antelope Valley accommodating such growth until the capacity of the environmental, economic, and man-made or social systems is attained.

(Preliminary Antelope Valley Areawide General Plan, Pg. 23)

With regard to urban land supply, the allocation of future urban

expansion areas reflects mapped and textual policies of city and unincorporated community plans covering the planning area*

Of the total 30,100 25,000 acres designated allocated for urban expansion use, 76% 71% fall within the cities of Palmdale and Lancaster. The remaining 24% 30%, or 7,200 acres, lying within unincorporated county territory is primarily associated with the community of Quartz Hill and southeast Palmdale.

Virtually all urban expansion lands allocated within unincorporated areas have been designated for future industrial or residential use. Approximately 90% (6,300 acres) is shown within the Low Density Residential classification of the Land Use Policy Map. As briefly mentioned above, both the quantity and distribution of residential expansion lands reflect the attitudes and preferences of community residents as expressed in the Preliminary Antelope Valley Areawide General Plan. In addition, such lands are relatively undifferentiated in terms of capability to support urban development i.e., limited environmental constraints. The proposed "Development Qualification" procedure (Technical Supplement D-2 to the Proposed Plan) is designed to ensure that urban expansion will occur in an orderly fashion and conform to the goals and policies of the plan.

~~The City of Lancaster is currently in the process of revising its general plan. The countywide General Plan will be modified to reflect the newly adopted city plan at such time as it becomes available.~~

SECTION 3.0

STATEMENT OF OVERRIDING CONSIDERATIONS

SECTION 3.0 STATEMENT OF OVERRIDING CONSIDERATIONS

Introduction

When potential significant effects have been identified, even though the overall impacts of the project are positive, Section 15089 of the "State EIR Guidelines" states that findings are to be made regarding why the project is approved. While these findings are a part of the resolution approving the project, they are based on the reasons discussed below, including the specific "overriding" social and economic considerations associated with the Proposed General Plan.

As indicated in the following discussion, the beneficial economic and social impacts of the Proposed General Plan are believed to far outweigh any potential significant environmental effects, because:

- (1) The actual significant adverse effects are likely to be substantially less than what this EIR designates as potentially significant;
- (2) The quantity of mapped expansion land in environmentally sensitive areas is quite limited and a small fraction of the total amount of developable land in the county;
- (3) There are strong reasons for permitting development in such areas despite their potential environmental problems; and
- (4) There are substantial economic and social benefits that will occur from the implementation of the Proposed Plan, particularly with regard to housing and economic development.

Background

The identification of potential significant effects in Section 7.0 of the Final EIR was based on the assumption that all of the Plan's mapped urban expansion will be fully developed based on mapped policy. It is arguable whether these potential effects should be identified as significant, since they are "worst case" effects--the analysis assumes the development of all areas designated as urban expansion--and since the policy maps are to be reviewed, interpreted and applied within the overall context of the Plan's goals and policies. This determination of significance becomes even more questionable when the importance of the proposed Development Qualification Procedure, which is recommended for inclusion in the plan as Technical Supplement D-2, is taken into consideration. Implementation of this procedure is designed to assure that future development within urban expansion areas is consistent with the plan's textual goals and policies and that it is related to its economic, social and environmental costs.

The potential significant effects identified in Section 7.0 of the Final EIR are as follows:

- (1) In mapped urban expansion areas--those impacts associated with development of "D" and "E" land, as well as seismic, slope stability, fire and mudflow hazard, agricultural resources and scenic qualities;
- (2) In mapped infill areas--those impacts associated with Development of "D" and "E" lands, as well as seismic and slope instability hazards, and scenic qualities;
- (3) In non-urban areas--fire hazard.

Each of these potential significant effects is further considered below.

POTENTIAL SIGNIFICANT EFFECTS WITHIN URBAN EXPANSION AREAS

Mapped Urban Expansion within Land Classified by ESRI as "D" and "E"

Section 7.0 of the Final EIR identified the plan's mapped urban expansion within lands classified by Environmental Systems Research Institute (ESRI) as having a "very low" or "low" capability for urban development (identified as "D" and "E" lands) as potentially significant. This was particularly the case since ESRI's weighting system (as explained in Appendix I to this Supplement) allowed an approximation of "cumulative effects." As discussed in Appendix I under "Potential Urban Expansion Within D and E lands", despite their designation as low capability areas these lands are appropriately classified as suitable for urban expansion. A detailed explanation is provided by planning area. This determination is based primarily on such suitability factors as the proximity to existing urban development and the availability of infrastructure, the demand for housing, as well as the fact that the identified environmental hazards will be substantially mitigated. In addition, it is also explained in Appendix I that most of the land identified by ESRI as having a very high or high capability for urban development (identified as "A" and "B" lands) is actually located in areas remote from existing urban development and infrastructure and is therefore not appropriate for urban expansion.

It is again important to emphasize that the mapped urban expansion within the areas classified as "D" and "E" represents less than two (2) percent of the total lands so classified in the county (less than one percent of the "D" and "E" lands in the unincorporated area). Nearly all of the "D" and "E" lands in the County are shown in the plan as non-urban or open space.

Other Potential Significant Effects Within Mapped Urban Expansion Areas

Section 7.0 of the Final EIR also identified several individual environmental factors as potentially significant within mapped urban expansion areas. As noted above, these include seismic hazard, slope stability hazard, fire hazard, mudflow hazard, scenic qualities and agricultural resources. Since ESRI's land capability/suitability study included several of these factors--i.e., seismic hazard, slope stability hazard, fire hazard and mudflow (flood) hazard--in its weighted land capability/suitability system, the discussion in Appendix I referred to above provides the reasons why potential urban expansion is mapped within areas having these hazards. Again, the reasons are primarily related to such "suitability" factors as availability of infrastructure, proximity to existing urban development, and community preferences.

Since the ESRI system is oriented primarily toward those aspects of land capability which reduce development potential (i.e., hazards) rather than environmental resources (e.g., agricultural land, mineral resources), two of the potential significant effects identified within urban expansion areas--agricultural resources and scenic qualities--are not included in the ESRI system. In terms of scenic qualities, any development, even at non-urban densities would result in some level of impact, if it were to occur throughout the mapped urban expansion area. There is a strong market demand for housing in urban hillsides at low urban densities. This demand will be met either within Los Angeles County or in nearby counties. The potential urban expansion on hillside land (hillside land was used as the primary surrogate for scenic qualities in the Final EIR) is located near existing urban hillside development and is, in the South County, the major component of the vacant land remaining. In the Santa Clarita Valley (North County) the mapped hillside urban expansion is located in areas with a high demand for hillside housing reflecting strong community preferences

as reflected in the adopted Santa Clarita Valley Areawide Plan.

Again, the potential urban expansion areas are located in areas where infrastructure is readily available and in close proximity to existing urban development.

With regard to agricultural resources, the Proposed General Plan's commitment to a more concentrated urban development pattern requires a balancing of environmental resource protection with pressing social and economic needs for additional urban land. In the South County, in particular, the combined policy decisions of 79 cities and the county, reflecting years of urbanization policy, for all practical purposes precludes the preservation of agricultural lands except on an interim basis. South County land use projections reflect the extremely tight supply/demand relationship which results in the need to absorb virtually all remaining suitable land for urban uses in order to accommodate the anticipated growth and to reduce the pressure on those vast natural resource lands that the plan proposes to protect. Furthermore, most of the South County agricultural infrastructure has been disbanded and problems of urban encroachment have seriously undermined the capability to continue farming. Note, however, that even in urban areas the plan encourages retention of economically viable agricultural production through the identification and mitigation of adverse impacts.

Within the Santa Clarita Valley, a viable agricultural district continues to exist. However, it is slowly being converted to urban uses as population growth spills over from the San Fernando Valley. While the policy choices are difficult, the pressing need for additional urban land in this area, the lack of a large supply of suitable land to satisfy this need, the major difficulties of reversing current trends and redirecting growth elsewhere, and, the strong preferences of the local citizenry for accomodating growth, outweigh the loss of agricultural land.

POTENTIAL SIGNIFICANT EFFECTS WITHIN INFILL AREAS

Section 7.0 of the Final EIR also identified potential development within ESRI's "D" and "E" land, as well as seismic and slope instability hazard and scenic qualities as potential significant effects in infill areas. These mapped infill areas are located almost entirely within cities, and the plan maps generally reflect the locally adopted general plans of the various cities. The development of bypassed vacant land is consistent with the plan's emphasis on concentrated urban development in areas with existing infrastructure and surrounded by urban development.

With regard to scenic qualities, the effect within infill areas was discussed in terms of the development of urban hillsides. This acreage is located within already developed areas and, therefore, is not considered significant in terms of scenic qualities.

POTENTIAL SIGNIFICANT EFFECTS WITHIN NON-URBAN AREAS

Section 7.0 identifies fire hazard as potentially significant in non-urban areas. The plan recognizes that there is a limited, but persistent, market for residential development located in the more "rural" hillside areas. This non-urban development would be permitted only at very low densities. In this case, the plan reflects local community preferences for limited residential development in non-urban areas consistent with existing community character. The plan's textual goals and policies provide for compatibility with existing rural life styles.

OVERRIDING BENEFITS OF PROPOSED PLAN

The Plan encourages substantial social and economic benefits, including:

- A. Revitalizing approximately 120,000 acres of existing urban development.
- B. Conserving and maintaining approximately 503,000 acres of existing urban development.
- C. Rehabilitating up to 424,000 housing units; preserving 798,000 units by heavy maintenance and 1,342,000 units by routine maintenance.
- D. Constructing 612,000 new housing units.
- E. Increased low and moderate income housing so that 236,000 households needing assistance can be aided by 1985, and providing adequate affordable housing by the year 2000 through implementing the provisions of the plan including "fast track" processing, density bonus, review of ordinances, and tax-exempt bonding for housing.
- F. Focusing new urban development in the most suitable areas and encouraging a more concentrated urban pattern of development as reflected by: a projected countywide increase in urban population density of 380 people per square mile; a projected increase in the density of new residential development (infill and expansion) from the existing 6.6 units per acre to 7.8 units per acre*; a projected residential recycle density of 23.9 units per acre; and, a proposed system of multipurpose and single

* Also see Appendix II to this Supplement, which points out why more areas were not identified as suitable for medium to high density residential development in urban expansion areas. Primary reasons relate to local community preferences (especially compatibility with existing development), as well as environmental considerations and access and traffic congestion limitations.

purpose activity centers linked by improved public transportation (see Urban Form Policy Map).

- G. Reversing outmigration from older urban areas as typified by the Plan's projected population increase of 90,000 in the Central Planning Area which is a significant reversal of the 1970 to 1975 trend.
- H. Increasing public transit ridership from 3% of daily person trips in 1976 to 8% of daily person trips in 2000, as a result of the Plan's emphasis on transitway systems; transportation system management, including local bus service improvements; and improvements in commuter rail service.
- I. Increasing the numbers of jobs in Los Angeles County by a projected 661,000 with substantially reduced in-commuting from adjacent counties.
- J. Balancing regional issues with local community goals and preferences.

Conclusion

A number of potential significant effects have been identified as associated with the Proposed Plan. Because this analysis is based primarily on the "worst case" assumption that all of the mapped urban expansion will be developed, without consideration of textual goals and policies, the actual effects of development are likely to be substantially less. Furthermore, there is strong justification for permitting urban expansion within the limited areas where development impacts have been identified as potentially significant, particularly in view of the substantial social and economic benefits that can only result from providing adequate land for housing and jobs.

SECTION 4.0

ADDITIONAL RESPONSES TO COMMENTS

SECTION 4.0 - ADDITIONAL RESPONSES TO COMMENTS

4.1. Responses to Comments Received During Public Review of the Supplement to the Final Environmental Impact Report, February-March, 1980.

On January 16, 1980, the Regional Planning Commission authorized the distribution of the RPC Responses to Board Motions and the Supplement to the Final Environmental Impact Report for public review and comment. A thirty day period ending March 14, 1980 was originally set for the receipt of written comments. Subsequently, in response to a recommendation from the Board of Supervisors, the deadline was extended two weeks to March 28, 1980, providing a total of 45 days for public review and comment.

This section is intended to respond to written comments on the Supplement to the Final EIR. Written comments were received during the public review period from the following organizations: Angeles Chapter of the Sierra Club; Center for Law in the Public Interest; Coalition for Los Angeles County Planning in the Public Interest; League of Women Voters; Malibu Township Council; Los Angeles Athletic Club.

Prior to preparing responses to these comments, it was first determined whether a comment dealt with a significant environmental issue. Then, it was determined whether or not a comment provided new information. In some cases, where a comment did not offer new material relating to a significant environmental issue, a response has been included simply to provide further clarification of a previous response.

1. Comment: The Supplement to the Final EIR does not provide parcel-by-parcel information, including maps, on specific areas of proposed urban expansion located within areas identified by ESRI as areas of hazard to public safety and areas of significant resource value (Center for Law in the Public Interest).

Response: This comment addresses the issue of the appropriate role and level of detail of a countywide general plan and environmental impact report. It must be stressed that it is the role of a countywide general plan to: (1) provide an overall set of goals and policies to guide countywide activities so that governmental decisions at all levels move in the same direction; (2) provide policy parameters to integrate more specific planning efforts in order to insure a compatible and effective regional approach; and, (3) provide effective planning for specific functions that can be best addressed at the countywide level. It is not the role of the countywide plan to identify specific land uses, or determine actual boundaries between land use categories (see page 3B of the revised "Introduction" to the Proposed General plan, as included in RPC Responses to Board Motions for Public Review and Comment).

As pointed out in the proposed General Plan Guidelines issued by the State Office of Planning and Research, "How specific and detailed a diagram of proposed land uses need be will depend on the size of the planning area and the intended uses of the diagram." The proposed "Guidelines" also point out that "large, complex jurisdictions frequently use diagrams with different levels of detail, such as a general diagram for the entire jurisdiction and a set of more detailed diagrams for various areas, communities, and neighborhoods." Further, Section 15147 of the State EIR Guidelines states the "degree of specificity required in an EIR will correspond to the degree of specificity involved in the underlying activity which is described in the EIR." Thus, given the role of the countywide plan, the EIR does not provide mapped information at the parcel level. However, information on potential impacts within "hazard" and "resource" areas is provided at a level more detailed than the planning

area level on which the general plan is based--e.g., for "D" and "E" lands, areas are identified as "Calabasas Park" or "Morrison Ranch in the Agoura Area."

As we have previously advised, the series of maps showing various "hazards" and "resources" where potential urban expansion is located, is available for review at the Department's offices in the Civic Center. The State EIR Guidelines allow an EIR to incorporate information by reference (Section 15149) and encourage specialized analysis and data to be placed in separate volumes (Section 15140c). The qualification for this approach is the availability of the information at a public building; since the maps are so available, this qualification has been met. We have not been made aware of any problems created by not including these maps in the EIR. Also, given their scale and the fact that precise boundary demarcations are not intended, and that there would be no way of accurately delineating a specific parcel at the reduced scale necessary for inclusion in the actual EIR document, their reproduction in the EIR itself would not be meaningful.

2. Comment: The adopted plans of the 80+ cities within the county cannot be "grandfathered" into the general plan (Center for Law in the Public Interest).

Response: The County does not propose or intend to adopt incorporated city plans as part of the countywide General Plan document. While Department staff utilized city general plan diagrams as basic data input during the formulation of countywide land use and general development policy, such diagrams are generalized and reflected only to the extent that they conform with the goals and policies of the Proposed General Plan. For example, while many city plans do not recognize Significant Ecological Areas, the countywide Proposed General Plan acknowledges the protection of such areas as a critical regional concern, and delineates SEAs within both cities and unincorporated areas. Thus, while city plan diagrams were used in part, as "building blocks" for countywide land use and general development policy, they were by no means "grandfathered" into the Proposed General Plan.

3. Comment: With reference to the criteria for determining the suitability for urbanization of "D" and "E" lands, no guidance or criteria are suggested in the Supplement to the Final EIR for defining "availability of infrastructure" or "proximity to existing urban development." In regard to reasons why "A" and "B" lands are not suitable for urbanization, "remote from infrastructure," "isolated in rugged terrain," and "lack of demand" are not defined (Center for Law in the Public Interest).

Response: This comment provides no guidance as to any specific concerns regarding various areas identified as "D" or "E" or "A" or "B" lands. Information on "D" and "E" lands within mapped urban expansion areas (a small fraction of total "D" and "E" lands), and the measures which will mitigate the potential hazards involved, have been discussed at length in the Final EIR and in the Supplement to the Final EIR. A greater level of detail of background information on the process of determining whether a particular area is suitable for urbanization is not appropriately included in a general plan or EIR for a general plan. The staff of the Department has made an effort to describe the general criteria utilized in determining which areas would be most suitable for urbanization, and has made the maps available to anyone who wishes to look at them. A review of these maps would indicate the relationship of the various "A", "B", "D" and "E" lands and existing developed areas.

4. Comment: With regard to special management areas, project-by-project review will occur only where SEAs are involved. The hillside management review process is not applicable in non-urban areas where a developer limits his request to the midpoint range of densities allowed by the general plan for his parcel. In hillsides designated as urban, the performance review procedure is not applicable so long as the developer proposes to develop to a density below the midpoint of the density range. A "specific plan" type of procedure is not required for floodplains or SEAs (Center for Law in the Public Interest).

Response: This comment appears to be based on a mis-reading of the plan. In reference to the Hillside Management Performance Review Procedure in non-urban areas, development proposals will be reviewed vis-a-vis established hillside performance criteria within the course of normal case processing. Proposed development exceeding established density thresholds (not midpoints) will require Regional Planning Commission review and approval of a Hillside Development Management Permit (see the performance review procedure, page III-73 of the Proposed General Plan as revised in the RPC Responses to Board Motions for Public Review and Comment. Thus, project-by-project review will occur for all non-urban hillside projects. In urban areas (as distinct from non-urban areas), proposed developments not exceeding density midpoints will similarly be reviewed for compliance with applicable performance criteria as part of normal case processing procedures, while those exceeding midpoints will require the review and approval of a Hillside Development Management Permit. In addition, projects within SEAs (including those requiring zoning, land division, building and grading permits) are subject to a performance review procedure, including review of proposed project designs by an appointed SEA Technical Advisory Committee. With regard to flood hazard areas, any development proposed within a flood prone area is to be reviewed by the County Engineer or Flood Control District who will define the areas within which no permanent structures shall be permitted. In addition, the County is in the process of mapping flood protection districts for all major flood prone areas. These maps will more precisely delineate existing watercourses and areas necessary to provide reasonable protection from overflow, erosion, and debris deposition. Thus, all developments within the identified flood prone areas will be reviewed at the project level.

5. Comment: The community plans and areawide plans previously adopted by the county were prepared before the county-wide

goals and policies and must be re-evaluated in the county-wide plan context. The General plan is responsive to local wishes rather than regional concerns (Angeles Chapter of Sierra Club; Center for Law in the Public Interest).

Response: The Countywide plan diagrams are not a direct reflection of the adopted community/areawide plan maps. As was the case with city general plans, unincorporated areawide and community plans were not adopted or "grandfathered" into the Proposed Plan. Each one was viewed in terms of the Countywide plan's overall policy direction. The integrated yet distinctive relationship of the individual community/areawide plans to the countywide plan has been further clarified by the recommended changes to pages 3 - 9 of the "Introduction" to the Proposed Plan. As explained in the revised "Introduction," the Countywide Chapters and Elements serve to guide decisions on regional concerns, whereas the areawide or community plans serve to guide local matters. Adopted community or areawide plans may set forth precise standards and criteria provided such standards and criteria are consistent with the general countywide provisions.

6. Comment: The Proposed General Plan does not contain sufficient specificity in discussing the Development Qualification Procedures, and lacks the ability to pace development according to the availability of services (Center for Law in the Public Interest).

Response: This criticism of the Development Qualification Procedure (DQP) may stem from a failure to review in detail Technical Supplement D-II, which is included in the General Plan supplement entitled RPC Responses to Board Motions for Public Review and Comment. This Supplement, in combination with several other portions

of the plan dealing with these concerns, provides adequately detailed guidance for the preparation of implementing ordinances and procedures. The DQP will also provide sufficient guidance on the proper timing for new urban development--new urbanization can occur only when adequate service levels can be achieved. It should be noted that simply tying development to a time schedule (mapped phasing) does not adequately ensure that the development will occur only when facilities and services are available and financeable at a reasonable cost. In addition, the amount and distribution of mapped urban expansion land within unincorporated areas--(the pattern of relatively small parcels)--is not conducive to specific mapped phasing.

7. Comment: The criteria suggested as a part of the Development Qualification Procedure do not ensure that the mapped supply of urban sites is made available only in accord with actual needs or demands generated over time, and that the site least costly to taxpayers will be developed first. It is in the interest of every taxpayer in the county that urban expansion in outlying areas be controlled (Center for Law in the Public Interest; League of Women Voters).

Response: Developers normally do not build except where there is a demonstrable market for housing or other facilities. The issue, then, is not whether "unneeded" development will take place, but whether development occurs in a fashion that is cost efficient, safe, and environmentally sensitive. It is believed that DQP will be an effective mechanism for assuring that developers build in the areas which have the least public costs associated with them and will, through the application of special management ordinances, assure safe and environmentally sensitive development.

The chronological mapped phasing of future urban development does not assure that at any given future time the amount of land available will be only that amount which will prevent premature urbanization on the one hand, or artificial price inflation on the other.

Volatile economic and demographic factors (e.g., different financing conditions, diverse owner preferences, changing market patterns) create short-term changes in the demand for new urban land; a growth policy based on mapped phasing would be susceptible to such frequent need for plan amendments as to render such phasing obsolete in a few years. In contrast, the dynamic DQP approach, which evaluates a development proposal according to current conditions, assures that urban growth will occur in a rational manner without the serious risks inherent in mapped phasing.

8. Comment: It is unclear whether the DQP applies to proposed commercial and industrial projects, and it should also apply to infill areas. The DQP does not apply to areas proposed for urbanization within cities in the county (Center for law in the Public Interest).

Response: All components of the DQP would apply to urban development, including residential, industrial, and commercial uses, in areas designated as Urban Expansion. Such areas are more likely to require extraordinary review procedures, than infill areas or land within cities, which are already served by urban services or can generally obtain them efficiently. Therefore, we do not believe it to be necessary to apply as rigorous a test of service availability in these areas. Moreover, infill development contributes toward socially desirable goals such as energy conservation and revitalization of older urban areas. It is logically inconsistent to argue that the County's "overage" and "lack of phasing" will promote unnecessary sprawl, while at the same time maintaining that the county should impose the same constraints on urban infill as on urban expansion.

Those special management components of DQP, where concerns of environmental sensitivity and public safety exist, will be applied to all unincorporated urban areas. Since state law does not provide the county with jurisdiction over land development in incorporated areas, the County can only encourage cities

to utilize many of the review mechanisms proposed in the General Plan.

9. Comment: The Development Qualification Procedure will not apply where a developer/property owner already has existing zoning, where no subdivision is involved (Center for Law in the Public Interest).

Response: The number of development projects in urban expansion areas which would not be subject to some sort of discretionary approval (e.g., conditional use permits, subdivisions, zone changes) is very minor. However, should it become apparent during the formulation of the mandatory zoning consistency program, that a mechanism for regulating non-discretionary projects (i.e., building permits) is required, consideration will most certainly be given to overlay zoning, down zoning or other premature development control techniques. In addition, building permits will be monitored as part of the DQP process, providing an on-going method for assessing whether additional controls on development having existing "urban zoning" are necessary.

10. Comment: A "phasing" mechanism should be used in order to provide a mechanism for public infrastructure planning (Center for Law in the Public Interest).

Response: The DQP is designed to relate to a comprehensive data base including data on facility and service capacity, capital and operating costs of service extensions and facility expansions, and revenues generated. This information will be collected on a area-wide basis and the cumulative impact of development will contain agreed upon methods to finance such extensions as are necessary. When extensions are programmed, the application of DQP will encourage development to locate in proximity to such extensions, assuring efficient utilization. Thus, DQP is believed to be a better mechanism for public infrastructure planning than a chronological mapped phasing system.

11. Comment: The plan amendment process is a more orderly, clearly defined process for developing the information the DQP is designed to obtain (Center for Law in the Public Interest).

Response: The plan amendment process is intended to modify plan policy, while DQP is intended to implement plan policy.

The Center for Law in the Public Interest has noted the "arbitrariness" of any boundary drawing and called for an attempt to make the boundaries reflect "a rational, fair and comprehensive planning process, based on legitimate planning criteria, to the extent possible." That is precisely what the General Plan process has attempted to do. The boundaries drawn on General Plan maps provide for some flexibility in regard to land demand and supply precisely because "arbitrariness" exists in any boundary drawing and the County wishes to guard against individual property owners and prospective housing occupants being unintentionally and unnecessarily harmed. The state-of-the-art of planning does not permit, particularly at a countywide plan scale, precise, errorless predictions of future events.

Thus, the General Plan takes two approaches. First, it establishes a boundary on a map which distinguishes between those areas that are probably suitable for urbanization subject to additional review and conditions for development; and those parcels that are probably not suitable for urbanization at this time and, therefore, require a more stringent review process, including a plan amendment. This boundary is based on legitimate planning criteria and the best information available at the time. However, owners of land shown as urban expansion do not receive an automatic entitlement to urbanize such land. Secondly, a Development Qualification Procedure is imposed on the urban expansion areas, and through the review mechanism, an "effective urban boundary" is established. The latter boundary is drawn more precisely by the application of legitimate planning criteria and the more detailed and complete information available at the time a project is reviewed.

4.2. Responses to Comments, Regional Planning Commission's Public Hearings on Final Environmental Impact Report and Supplement to the Final Environmental Impact Report, May-June, 1980.

Testimony on the Proposed General Plan (March 2, 1979), the RPC Responses to Board Motions (January 16, 1980), and Additional Recommended Changes to the Proposed General Plan (May, 1980); as well as the Final Environmental Impact Report (January 16, 1980) was accepted by the Regional Planning Commission at public hearings on May 21, 1980, May 27, 1980, and June 2, 1980. In addition, written comments were accepted through June 16, 1980.

This section responds to comments on the Final EIR and Supplement to the Final EIR. Very limited testimony was received on these documents. Some of the comments received were repetitive of earlier comments submitted and previously responded to. Comments were received from the following organizations: Coalition for Los Angeles County Planning in the Public Interest; LAACO Incorporated; and E. L. Pearson and Associates.

1. Comment: The General Plan and EIR have become obsolete regarding air quality. The statement in the EIR that emissions can be reduced further with the plan's transit diversion needs re-evaluation. (Coalition for Los Angeles County Planning in the Public Interest).

Response: The analysis of air quality in the EIR for the General Plan (Section 6.6 of the Final EIR) is based on the data developed as part of the Air Quality Management Plan (AQMP) process. The AQMP has been approved by the South Coast Air Quality Management District and the State Air Resources Board. As explained on page 6-42 of the Final EIR, the emissions projections in the AQMP included reductions resulting from source control rules implemented in 1976 for mobile sources and in 1978

for stationary sources. In addition, approximately 75 tactics for reducing air pollution were recommended in AQMP to further reduce air pollution, and implementation of these tactics would provide for achievement of federal standards for all pollutants by 1987. While recent statements indicate Federal Air Standards may not be achieved by 1987, the Clean Air Act still exists and efforts are being made to meet the necessary standards. However, should the standards not be met, the air quality analysis in the EIR, which projects an overall reduction in air emissions based on currently mandated rules and regulations, still appears to be accurate. Even with the plan's projected population growth of 808,000 persons by the year 2000, implementation of current air pollution regulations will reduce emissions by the year 2000. Thus, the plan's projected growth will not have a significant effect on air quality.

With regard to transit diversion, since the analysis of mobile source emissions in the Final EIR (see page 6-51) was based on a very conservative 0% transit diversion, it is safely assumed that any transit diversion will reduce mobile energy usage as well as emissions.

2. Comment: The EIR has become obsolete regarding energy usage. (Coalition for Los Angeles County Planning in the Public Interest).

Response: The analysis of energy usage in the Final EIR was based on the plan's projected population increase of 808,000 persons by the year 2000. The reduction in mobile usage was based primarily on an assumed automobile mileage improvement from 13.5 miles per gallon in 1975 to 27.5 miles per gallon for autos manufactured after 1985, as required by federal regulations. Figure 6-25 in the Final EIR (page 6-129) showed an increase in residential, commercial and industrial usage, and a decrease in mobile usage, with an overall reduc-

tion in energy usage. Since the assumed reduced mobile energy usage has been validated by a continued trend toward decreased consumption of gasoline, it is maintained that mobile energy usage will not result in any significant impact.

3. Comment: The EIR does not address energy issues in regard to in-commuting from other counties. (E. L. Pearson and Associates).

Response: The EIR for the General Plan did take this aspect of energy usage into account. The projected VMT figures on which the mobile energy usage analysis was based included trips both into and out of Los Angeles County from surrounding counties.

4. Comment: The EIR fails to consider the sociological and psychological effects of forcing more intensive use of property for housing. (IAACO Incorporated).

Response: There is no requirement in CEQA or the State EIR Guidelines to consider in an EIR the psychological or sociological impacts referred to. The EIR for the general plan discusses potential adverse effects associated with increased densities—e.g., in terms of noise levels, greater demands on public facilities, and visual impacts, as well as the potential displacement of people in areas where recycling or rehabilitation takes place (see Sections 6.14, 6.15, and 6.17 of the Final EIR).

5. Comment: The "Topanga Ranch Property" is identified as recreational open space for "public acquisition" in the general plan. The proposed recreational uses are not economically feasible. The EIR does not explain the need for this type of recreational use, or how maintenance will be funded. (IAACO

Incorporated).

Response: The bulk of the area in which the property referred to is located is within the non-urban classification of the Proposed General Plan's Land Use Policy map and subject to either the Hillside Management or Significant Ecological Area provisions of the plan; or is within the commercial classification. Thus, the land is not designated for public open space recreational purposes. The draft Malibu/Santa Monica Mountains Areawide Plan, which is expected to be the subject of public hearings later in the year, shows more specific land uses and densities for the property in question.

With reference to the EIR, since the Proposed Plan does include policies and recommended actions regarding additional public recreation areas, a discussion of potential adverse effects on fiscal resources is included in Section 6.21 of the Final EIR. The need for additional recreational land is discussed in the Proposed Plan's Conservation and Open Space Element.

SECTION 5.0

ENVIRONMENTAL ANALYSIS OF BOARD OF SUPERVISORS'

CHANGES TO THE PROPOSED GENERAL PLAN

SECTION 5.0 ENVIRONMENTAL ANALYSIS OF BOARD OF SUPERVISORS'
CHANGES TO THE PROPOSED GENERAL PLAN

Subsequent to the completion of the Final Environmental Impact Report (EIR) dated March 2, 1979 and the Supplement to the Final EIR dated August 4, 1980, the Board of Supervisors considered the proposed general plan at public hearings on November 13, 1980, November 18, 1980, and November 20, 1980. On November 25, 1980, the Board made several changes to the plan prior to adopting it. These revisions fell into four categories: editorial changes, textual changes, revised projections, and mapped policy changes. This Section includes an environmental analysis of these changes.

In accordance with the California Environmental Quality Act, an Initial Study was prepared for the changes (except those of an editorial nature). The same methodology was employed as was employed in previous environmental analysis work. The environmental analysis was made on both an individual and cumulative basis.

Given the scale of the general plan and the analysis contained in its EIR, the planning staff is of the opinion that the Board revisions do not substantially change the environmental analysis in the Final EIR dated March 2, 1979 and the Supplement to the Final EIR dated August 4, 1980.

5.1 Textual Changes

- a. The text of the Conservation and Open Space Element regarding appropriate uses within existing open space areas has been modified to permit new as well as existing and expanded mineral extraction operations to be considered compatible with existing open space provided that certain specific conditions are met. Any new facilities would be subject to an environmental analysis. This change in language has been determined to have no significant effect.

- b. The text of the Water and Waste Management Element has been revised. These are minor changes in text, policies and action programs which have been determined to result in no significant effect on the environment.
- c. The text of the Land Use Element has been changed to clarify that the Proposed Plan is not intended to preclude approved tentative tracts or their extension if approved subsequent to December 31, 1978 from securing construction permits. Although the Plan may not have inhibited such development in any case, this change could facilitate approximately 1200 acres of additional urban expansion within areas presently designated as non-urban on the Proposed Plan's policy maps. It is reasonable to assume that this acreage would result in an increased amount of land potentially affected by or affecting the hazard/resource impact categories discussed in the Plan. However, because of the "worst case" assumptions already embodied in the EIR, this change does not result in any change in the conclusion as to significant effects included in the EIR.

5.2 Revised Projections

- a. The population, housing, employment and land use projections for the County have been modified to reflect increased projections for the Santa Clarita Valley. An additional 51,000 persons have been added to the year 2000 population figure (a revised year 2000 population of 165,000 for the Santa Clarita Valley is projected). This revision of plan projections was determined to result in no substantial change in terms of the environmental analysis already carried out for the Proposed General Plan.

5.3 Mapped Policy Changes

- a. Revision of Land Use Policy Map (and other plan maps as appropriate for consistency)

An analysis of the potential environmental impacts of four proposed changes in the Land Use Policy Map was made, on both an individual and cumulative level. These changes are identified as the B and G Builders, Cowan, Liu and Cadillac-Fairview development proposals. The potential effects, in terms of hazards (e.g., geologic/seismic, flood/mudflow, fire) and environmental resources (e.g., hillsides, areas of high scenic quality), and the designation of the land as "D" or "E" ("low" or "very low" capability for development) were determined. The quantification of potential effects related to the map changes is shown as Figure 5-1--"Environmental Analysis of Mapped Policy Changes." While potential environmental effects are associated with these map revisions, the level of impact, even on a cumulative level, is not significant and would not alter the discussion of impacts already included in the Final EIR and the Supplement to the EIR (see pages 3-1 through 3-6 of this Supplement). These documents identify several environmental factors as potentially significant and this determination would not be altered by these revisions in the policy map. This is particularly true given the "worst case" analysis in the EIR (as explained in Section 3.0 of the Final EIR for the Proposed General Plan). This Supplement (Section 3.0) also includes a Statement of Overriding Considerations explaining why the beneficial social and economic impacts of the General Plan are believed to outweigh the potential significant effects identified; this statement also applies to the changes.

- b. Revision of Special Management Areas Policy Map (and other general plan maps as appropriate for consistency)

The Special Management Areas Policy Map has been amended to reinstate approximately 190 acres of land adjacent to Tonner Canyon (SEA #15) as a part of the Tonner Canyon SEA. This reinstatement would result in a positive effect on the natural environment (biotic, scenic and other natural resources).

The elimination of specifically designated boundaries of SEA #29, allowing boundaries to be determined as a part of the Local Coastal Plan (LCP) process, was analyzed in terms of environmental effects. This revision would not result in any change in the analysis of effects included in the Final EIR and its Supplement. A study is currently underway to determine the appropriate boundaries to provide protection for the biological resources of this SEA, and the Coastal Commission policy is to deny development permits which might jeopardize preparation of the LCP, thus providing protection for the resources.

FIGURE 5-1
ENVIRONMENTAL ANALYSIS OF
MAPPED POLICY CHANGES

PROJECT	ACREAGE	SEISMIC	UNSTABLE	FIRE	MUDFLOW	FLOOD	SCENIC	HILLSIDE(%)		SUITABILITY	
		HIGH	SLOPE	HIGH	HIGH	HIGH	HIGH	15-30	30+	D	E
B & G Builders	60	0	20	0	20	10	10	0	20	0	60
Cowan	215	0	0	200	0	0	0	0	200	170	0
Liu	55	0	55	55	45	0	0	0	55	55	0
Cadillac-Fairview	115	0	0	0	0	0	10	20	0	0	0
(Northwest San Fernando Valley)											
TOTAL	445	0	75	255	65	10	20	20	275	225	60

APPENDIX I

RESPONSES TO COMMENTS RELATED TO
THE LAND CAPABILITY/SUITABILITY STUDY
CARRIED OUT BY ENVIRONMENTAL SYSTEMS
RESEARCH INSTITUTE (ESRI)

APPENDIX I

RESPONSES TO COMMENTS RELATED TO THE LAND CAPABILITY/SUITABILITY STUDY CARRIED OUT BY ENVIRONMENTAL SYSTEMS RESEARCH INSTITUTE (ESRI)

Several of the comments and questions received were related to the land capability/suitability study carried out by a private consultant--Environmental Systems Research Institute (ESRI)--during the early stages of the general plan program. The major comments and questions are as follows:

1. The alternative/mitigation measure of mapping lands classified as "A" and "B" rather than "D" and "E" for urban expansion is unaddressed in the Final EIR. "A" and "B" lands are available in the five fringe planning areas. Why not direct all urban expansion away from lands unsuitable for urban development because of hazard/natural resource conflicts? (Comment #1.3.10 of the Center for Law in the Public Interest).
2. The consultants' recommendations regarding maximum advisable residential densities within hazard/resource areas, including densities on "D" and "E" lands, are entirely omitted from discussion in the Final EIR. (Comment #1.3.11 of the Center for Law in the Public Interest).
3. The EIR is deficient in not including calculations for infill development and urban expansion within the "C" category, including lands with a 16-30 percent slope and subject to fire hazards (now identified as "B" lands).

(Comment #1.4.3 of the Coalition for Los Angeles County Planning in the Public Interest).

BACKGROUND

Environmental Systems Research Institute (ESRI)--consultants to the Department--was responsible for correlating and interpreting environmental information and for the creation of an environmental data bank.

As explained in the Technical Report, the land capability/-suitability analysis developed by ESRI included twelve environmental components: seismicity (rupture and shaking), slope, slope stability, liquefaction, soil conditions, flood, fire, erosion, minerals, watershed and significant ecological areas. Thirty-three environmental variables subsumed within the twelve environmental components were also identified. Using the above information, the consultants applied value levels to each of the components and variables in terms of their ability to absorb various degrees of development and derived a composite environmental resources data map subdivided into five classes.

A number of considerations and factors were taken into account in the class assignment of each environmental variable. The most basic and important of these were:

Significance- Those components and variables which were regarded as posing the greatest negative impact with respect to human health and safety, economic and investment expenditure, and environmental and ecological quality were conceived to exert the most severe constraints on development.

Incidence- Those variables which extend over large portions of the study area and county were generally regarded as more normal and less severe constraints than those which were very limited in their distribution. High or moderate fire hazard and moderate ground shaking potential represent phenomena which can occur over much of the study area and the county. By contrast, the incidence of active ground faulting or active slope instability is considerably less.

Mitigation Potential- The technical feasibility and economic implications of mitigation measures were directly tied to the assignment of a level of constraint for each variable. The greater the internal and external costs and the more uncertain the technical feasibility for mitigation, the more severe was the assignment of constraint.

Given the foregoing principles, a variable such as an active earthquake fault which was considered to be environmentally significant, very limited in its distribution, and unsusceptible to mitigation, was regarded as constituting a severe constraint on development.

Ground shaking, by contrast represents a phenomenon which pertains throughout the study area and the county and which is more readily mitigated. It is thus conceived to range in value from no constraint to a minor-moderate constraint.

In the Final Report prepared by ESRI, it was further stated that "differing judgments with respect to the selection, interpretation, and weighting of some variable are inevitable", but stressed that the judgement and rationale of the study team are open to ready scientific and public scrutiny.

DISCUSSION OF CONSULTANTS' RECOMMENDATIONS REGARDING APPROPRIATE
DENSITIES WITHIN HAZARD/RESOURCE AREAS

I. Introduction

Before analyzing the recommendations of the ESRI Final Report, the nature of the consultants' study and what it was intended to accomplish should be understood. The report and its key product, the Natural Resources Inventory Map, was intended as an input to the preparation of land use recommendations; it is not--and was never intended to be--a land use plan in itself.

The ESRI Land Capability/Suitability Study may be somewhat of a misnomer, since it is weighted heavily toward land capability; that is, the relationship between land development potential and environmental factors which reduce that potential such as fire, flood, seismic and slope stability hazards. Land suitability, on the other hand, deals with two other types of factors: environmental resources and urban infrastructure factors. Environmental resource areas (such as ecological areas, agricultural lands and mineral reserves) are considered to have a low rating for urban development, since once developed, the resources are virtually lost. Urban suitability refers to such factors as the existing land development pattern, existing and planned public facilities and services (such as roads, sewers and water lines), and the amount of projected urban land needs. The more urban suitability factors near a given site, the higher the land suitability rating.

The ESRI study is weighted heavily toward rating urban development potential in terms of environmental hazards, gives somewhat less weight to most environmental resources, and includes

no weighting for urban suitability factors. The ESRI report itself recommends that when using the study to determine the location and intensity of new development, that adequate consideration should be given to the following additional factors:

- a. Existing land use and development patterns;
- b. Available and planned urban infrastructure;
- c. Social needs for new housing, employment, educational facilities, recreational opportunities and the like; and
- d. Economic needs for commercial and industrial development, resource extraction and, at least in the North County, agricultural production.*

If the above factors were not recognized in the planning process, it would have been a simple matter to take the finished ESRI ratings as shown on the Natural Resources Inventory Map and allocate, in a rigid manner, urban uses to areas of highest capability for development, and non-urban and open space uses to areas of lowest capability. The results would have been patently foolish. Many scattered and remote areas would be slated for urbanization while many close-in and generally urbanized areas would be left to non-urban or open space uses. In light of energy conservation concerns and the Proposed General Plan's emphasis on a more concentrated development pattern, the land suitability/capability recommendations clearly need the integration of the urban suitability factors suggested above to make sense in the formulation of recommendations for future land use.

It also should be pointed out that the automated data base

* See ESRI Final Report, Pages 48-50.

used in the ESRI study was limited to those environmental phenomena for which full areal coverage was available, and was generally limited to a ten acre resolution. Thus the study recommendations are based on highly generalized data which requires further resolution at the area or community planning level.

When relating the ESRI Final Report recommendations to significant impacts identified in the Proposed General Plan EIR, several issues arise which require resolution through the comprehensive planning process:

- a. Environmental protection versus the increasing public need for urban development, particularly affordable housing; and
- b. State policy discouraging premature and unnecessary conversion of open space land to urban uses versus the need to allocate sufficient land for urban uses and at varied residential densities to assure low land costs for development of affordable housing and to encourage commercial and industrial locations to enhance economic and employment opportunities.

Recognition of these issues appears to be the reason why the consultants recommend the need to include social, economic and service level suitability factors along with raw land capability/suitability recommendations. Of course, adherence to the California Environmental Quality Act (CEQA) and State planning law provides further guidance on the resolution of these very serious issues. Vital to these concerns is the role of public input to the planning process. Land use determinations cannot be made solely through computerized modeling but require the assistance of surveys, citizen

planning group discussion and the legally required public hearing forum. The Proposed General Plan policy was formulated with the emphasis on all of these citizen-based inputs.

The Final Report presents valid recommendations based on a scientific, computerized study. These recommendations are appropriate for application over a major portion of the County. However, rigid application of the recommendations without balancing environmental, social and economic needs is neither good planning practice nor consistent with the consultants' recommendations.

As a further aid in analyzing the consultants' Final Report recommendations, the purpose, methodology and scope of that report is presented in summary form:

A. Purpose of Final Report

1. To define a concept of land capability/suitability;
2. To outline and evaluate methodology employed in mapping and analysis of environmental data;
3. To present guidelines for preserving significant ecological areas (SEAs); and
4. To present guidelines and standards for utilizing environmental data in preparing the Conservation/Open Space and Land Use Elements.

B. Methodology of Final Report

1. To create a natural resources inventory mapping process;
2. To relate land use standards keyed to the mapping process; and

3. To temper the recommendations through assimilation of social needs, public and private costs, existing and planned urban development and infrastructure (these factors were not included as part of the ESRI study).

C. Application and Scope of Final Report

1. Applies to non-urbanized and relatively unaltered open lands, not in public use; and
2. Does not extend to an analysis of infrastructure, nor across the full spectrum of physical and cultural phenomena incident in Los Angeles County.

II. Approach to Review of the Consultant's Recommendations

Chapter II (page 54-81) of the Final Report provides criteria/guidelines for preserving SEAs. Chapter III provides guidelines for utilizing environmental data in General Plan preparations. Staff has reviewed the recommendations of each chapter, and compared them to the Proposed General Plan dated March, 1979 for consistency.

The consultants made a major contribution to the formulation of the plan and staff generally accepted the body of their suggestions with the exception of only four specific points:

- a. The consultants recommended no allowable private uses of land in SEAs aside from scientific study and/or light passive recreation. Staff believed that a more balanced approach between environmental concerns and a reasonable use of private property should be taken based on detailed biotic informa-

tion to assure protection of the identified resources.

- b. Staff suggested a revision to eliminate a series of urban type uses that were included in the "B" suitability class if they are on land exceeding 15% slope. This was rejected by the consultants and the consultant's judgement was substantially endorsed by the Planning Commission when they established a 25% threshold for hillside controls rather than the 15% originally recommended by staff.
- c. With regard to suitability for development considering interpretations of watershed the consultant recommended that soils found on steep lands with low water infiltration qualities are more suitable for development than soils on flatter lands. Staff believed that this distinction was not sufficient to be reflected in the plan and further that this interpretation that steep lands were better for development than flatter lands would lead to confusing and conflicting assumptions on land capability/suitability.
- d. The consultants included in their recommendations matrices assigning suggested land use and density/intensities based on persons per acre, floor area ratios, vehicle trips per acre and development capability classes. Staff found this system of assignment unduly rigid in relation to all the varying social, environmental and economic factors that must be considered for each individual development proposed.

Within the context of the total assignment, the differences of staff with consultant recommendations were very limited.

III. Comparison of Land Capability/Suitability Guidelines and Proposed General Plan Recommendations

A. Land Capability/Suitability Recommendations

The ESRI Final Report recommends a range of residential densities and other suitable land use types for each land capability/suitability class "A-E" and for various natural resource areas. Classes "A" and "B" are designated as having a very high to high level of capability for development and are recommended for urban use. Class "C" is designated as having a moderate level of capability for land development and is recommended for intensive urban use only where it is judged that hazardous characteristics can be mitigated. Classes "D" and "E" are designated as having a low to very low level of capability for urban development and are generally recommended for non-urban or open space uses.

Classes "A" and "B"

These classes are recommended by the consultant for absorption of urban expansion and infill. Certain lands classified as "A" or "B" by the consultants have been designated for non-urban use in the Proposed Plan. See "Analysis of Lands identified as 'A' and 'B' not mapped for Urban Expansion" below for a more detailed review of such lands.

Class "C"

Class "C" is recommended by the consultants for non-urban uses at no greater than one dwelling unit per acre. The

principal hazard associated with Class "C" is liquefaction, a seismically-induced hazard. The consultants recognize that this hazard can be mitigated through appropriate engineering measures, conformity with applicable code requirements and not locating emergency response facilities, water storage facilities, hospitals or places of public assembly in such areas. Certain "C" lands are recommended in the Proposed General Plan for urban development. Areas designated for urban residential development at densities greater than one dwelling unit per acre, virtually all of which are within liquefaction zones, are located almost entirely within the cities of Los Angeles, Carson, Cerritos, Walnut and Claremont. The largest amount of Class "C" land is found in the City of Industry, which intends to use this land on an interim basis for agriculture, and eventually for industrial uses rather than residential, thus mitigating the hazard concern. Thus, the Proposed General Plan reflects in this case the more detailed land use studies and policies of an incorporated area.

Classes "D" and "E"

Classes "D" and "E" are recommended by the consultants for very low intensity or open space uses because of severe hazards or high resource value. Of the 539,000 acres of county land identified by the consultants in the "D-E" categories, only an estimated 11,000 acres or 2% are mapped in the plan for urban use through expansion or infill.* The reasons for the urban designations are discussed below under "Potential Urban Expansion within 'D' and 'E' Lands".

* See Proposed General Plan Table 2.3 and Final EIR, Figures 7.1 and 7.2.

Conclusion on Land Capability/Suitability Recommendations:

The Proposed Los Angeles County General Plan has generally reflected the consultants' recommendations on the five capability/suitability classes. However, the Proposed General Plan has also integrated the urban suitability factors discussed above as a part of the formulation of recommendations for future land use. In addition to recognizing the land capability ratings provided by the consultants, plan policy was formulated with the social and economic needs of the community in mind as expressed through extensive Citizens' Planning Council, public opinion survey and public hearing input. The plan proposes performance review procedures, resource-related zoning and mandatory findings to carry out the dual land capability/suitability recommendation for hazard mitigation and resource protection.

B. Biotic Resource Areas

1. SEAs

The consultants recommended two types of permitted uses for Significant Ecological areas--regulated scientific study and very low to medium intensity recreational use. The Proposed General Plan also permits those two activities as compatible land uses. In addition, certain other uses may be compatible as determined by a detailed biotic survey and such conditions as may be necessary to assure protection of identified ecological resources (see Proposed General Plan, page III-40 for uses).

The wider range of possible permitted uses in the

plan stems from a more balanced approach between environmental concerns and needs for reasonable use of property than the consultants envisioned. In terms of SEA protection, opening up sensitive areas to public use for recreation may cause more problems in SEAs than protective private use at intensities compatible with resource protection.

It should be noted that on page 70 of the Final Report the consultants stated: "It would be unrealistic to designate significant ecological areas as permanent open space (i.e., only scientific study or recreation) in the General Plan without, at the same time, proposing means of acquiring them."

2. SEA Buffers

A 20 acre minimum lot size is recommended by the consultants for certain steep watershed areas adjacent to SEAs, especially in the Santa Monica Mountains. The General Plan also prescribes a 20 acre minimum for steep watersheds over 50% slopes. Further, the Plan's SEA buffers must meet the same requirements for detailed biotic studies and development controls as for SEAs.

3. SEA Transitional Zones

Transitional zones, surrounding SEAs, were recommended by the consultants for five acre minimum lot size. These unidentified zones presumably serve as buffers where no formal buffer has been delineated as above. Although these areas remain unmapped by the consul-

tants, the plan generally proposes hillside management, open space and non-urban designations for areas surrounding most SEAS.

4. Riparian Woodland Areas

These areas of streamside vegetation are recommended by the consultants for preservation throughout the county. The Proposed General Plan provides protection, either directly or indirectly, of riparian areas in floodprone areas through flood management ordinances, in hillsides through hillside management techniques and in the SEAs themselves through a performance review procedure. Protection is also provided through the current environmental review process on specific projects.

Conclusion on Biotic Resource Areas Recommendations:

The Los Angeles County Proposed General Plan recognizes the high resource value of SEAs, buffers and transitional zones to the plan's open space program. To retain this resource value, the plan recommends a performance review procedure for any proposed development within SEAs and further recommends an active search for funding mechanisms at all government levels for acquisition purposes. On balance this seems the most responsible and defensible position available to the county.

C. Other Resource Areas

1. Agriculture

The ESRI Final Report recommends that "existing and potentially highly productive agricultural lands (typically those with Class I and Class II soils) should be

preserved." This policy recommendation is admirable. However, the Proposed General Plan's commitment to a more concentrated urban development pattern requires a balancing of environmental resource protection with pressing social and economic needs for additional urban land. In the South County, in particular, the combined policy decisions of 79 cities and the county, reflecting years of urbanization policy, for all practical purposes precludes the preservation of agricultural lands except on an interim basis. South County land use projections reflect the desperate need to absorb virtually all remaining suitable land for urban uses in order to accommodate the anticipated growth and to reduce the pressure on those vast natural resource lands that the plan proposes to protect. Furthermore, most of the South County agricultural infrastructure has been disbanded and problems of urban encroachment have seriously undermined the capability to continue farming.

Within the Santa Clarita Valley, a viable agricultural district continues to exist. However, it is slowly being converted to urban uses as population growth spills over from the San Fernando Valley. While the policy choices are difficult, the county has concluded that the pressing need for urban land in this area, the lack of sufficient suitable land to satisfy this need, the major difficulties of reversing current trends and redirecting growth elsewhere, and the detrimental environmental consequences of allowing extensive hillside development to occur as an alternative, outweigh the loss of this agricultural district.

In the Antelope Valley, the Proposed General Plan does

recognize the continuing long term viability of agricultural production. The Plan recommends that nearly 285 square miles (182,000 acres) of existing and potential agricultural lands be set aside for inclusion in "Potential Agricultural Preserves." This policy will set into motion implementation of Williamson Act preserve contracts and mandatory lot size restrictions as a means of preserving these resource areas.

2. Mineral Resources

The consultants recommended the preservation of mineral extraction sites. Mineral resource sites were mapped by the consultants for the South County only, showing areas of sand and gravel deposits now largely covered by urbanization or flood control channels, oil and gas deposits in hilly areas such as the Baldwin Hills and Santa Susana Mountains, and small deposits of metallic and non-metallic minerals. To carry out the consultants' recommendation the Proposed General plan contains a Mineral Resource Special Management Area. The Plan requires a determination of compatibility between proposed development and mineral resource sites for uses other than those allowable for open space, passive recreation, agriculture, and of course, mineral extraction. Mineral resource sites are identified on the Special Management Areas Map.

Conclusion on other Resource Areas Recommendations:

The Proposed Los Angeles County General Plan, in agreement with the consultants, recognizes the need for protection of agricultural and mineral resource lands. The plan generally allocates these lands to non-urban or open space categories.

IV. Final Comments

For the reasons expressed in this appendix, it is contended that the Proposed General Plan substantially reflects the professional recommendations provided by the consultants concerning the relationship between land use policy and ESRI's land capability/suitability concept. Further, the plan incorporates the previously discussed urban suitability factors and performance review procedures.

ANALYSIS OF LANDS IDENTIFIED AS "A" AND "B" NOT MAPPED FOR URBAN EXPANSION

Maps have been prepared showing lands in the county classified as "A" and "B" by ESRI giving specific reasons why such lands were not considered appropriate for potential urban expansion. These maps are available for inspection in the Impact Analysis Section of the Department of Regional Planning. Basically, the maps show that in the North County (Antelope and Santa Clarity Valleys), the non-urban "A" and "B" acreage is either located in a Potential Agricultural Preserve, remote from infrastructure (in particular, sewers and water), located in a community with a strong preference for a rural lifestyle, or isolated in an area with little anticipated demand for urban development.

In the South County, nearly all the "A" and "B" acreage designated as non-urban in Malibu/Santa Monica Mountains is either inaccessible due to topography, or is remote from existing urban development and lacking infrastructure, or is in a SEA. Nearly all of the East San Gabriel Valley non-urban "A" and "B" acreage falls into one or more of the following categories: isolated in rugged terrain, lack of adequate access, lack of infrastructure, located in existing oil

field, surrounded by SEA, or in an area with a preference to continue an existing rural lifestyle. In the San Fernando planning area, the "A" and "B" acreage is for the most part isolated and/or is lacking infrastructure.

Thus, a review of the non-urban "A" and "B" lands at the general plan scale indicates that they are not suitable for urban development. While ESRI designated these lands as having a "high" or "very high" suitability for urban development based primarily on capability factors (e.g., fire, flood, seismic, slope stability hazard) when additional suitability factors are taken into consideration--proximity to existing development and availability of infrastructure (in accordance with the plan's emphasis on concentrated development, and with the concept of development paying for the marginal costs it generates), as well as existing densities in the area, other conditions near the site, "demand" for housing and community preferences--these "A" and "B" areas are most appropriately classified as non-urban.

POTENTIAL URBAN EXPANSION WITHIN "D" AND "E" LANDS

It should first be noted that modifications to some areas originally mapped as "D" and "E" lands were made, based on: (1) newly available mapping from the state on the location of the active fault zone in the Antelope Valley and San Fernando Valley areas; (2) newly available mapping from the U. S. Department of Housing and Urban Development Federal Insurance Administration as to the location of flood plains in Palmdale, Lancaster, and the Santa Clarita Valley (near Soledad Canyon and Seco Canyon Roads) and Malibu/Santa Monica Mountains; and (3) revised slope data from United States Geological Survey for the San Gabriel Valley.

A review of the lands identified as "D" and "E" is presented below by planning area--East San Gabriel Valley, Malibu/Santa Monica Mountains, Antelope Valley and Santa Clarita Valley. The limited acreage within

the San Fernando Valley is not discussed, as it is all located within the City of Los Angeles and is reflective of land use policy in its general plan. As was explained in Appendix C of the Final EIR, the areas designated on the plan maps for urban expansion located within cities are all designated for future urbanization by adopted city and community plans, consistent with the Regional Planning Commission's position regarding "sensitivity" to locally adopted plans, as well as plan policy supporting a more efficient utilization of existing infrastructure.

East San Gabriel Valley Planning Area

The 800 acres of mapped urban expansion located within "D" lands (there are no "E" lands mapped for urban expansion within this area) are associated with slopes of 30 percent or greater. Four hundred of the total acres are located within the unincorporated area, in the Puente Hills. It is important to remember that any development falling within this category would be subject to the performance review procedure for urban hillsides (i.e., dealing with project design and open space and public safety).

More specifically, the unincorporated "D" acreage is located in the Diamond Bar, Rowland Heights, Hacienda Heights and Industry areas. The majority of the acreage is within the Diamond Bar area, representing either existing or recorded tracts, or, in the case of the acreage known as "Roaring Creek" located at Pathfinder Road and the Orange Freeway, an area where water and sewage facilities are available and Pathfinder Road will be extended to provide access. The construction of Pathfinder Road to provide an important regional transportation link will involve substantial grading. The Rowland Heights and Hacienda Heights acreage, as well as the acreage near the City of Industry, are approved tracts.

Malibu/Santa Monica Mountains Planning Area

With reference to "E" lands, the very limited urban expansion acreage shown in this area (about 100 acres) reflects areas subject to flood hazard. These areas are located very near existing urban areas, and the flood hazard must be mitigated before further urban development is approved. More specifically, the acreage in the Agoura area is surrounded by existing urban development, and the Las Virgenes Creek area has access to existing urban infrastructure (freeway, water, sewers).

In terms of "D" lands, this designation reflects lands with a 30 percent or greater slope, areas of slope instability, and the potentially active Malibu Fault. Of the approximately 400 acres of potential urban expansion located on "D" lands in the Santa Monica Mountains area, most of the acreage identified reflects either mapping scale differences or existing urban development. The mapping problems are due to the 1"=6000' scale of the source maps: the 1"=500' scale maps prepared for the Malibu/Santa Monica Mountains Areawide Plan have identified areas with 30 percent or greater slope, unstable slopes and potentially active faults using a one acre grid (as compared to a 10 acre grid used by ESRI).

With reference to areas of 30 percent or greater slope, the more precise mapping carried out for the area planning program does not show, except in a few very limited instances, urban development on slopes of 30 percent or greater. In the case of slope instability, the urban expansion areas shown in the general plan represent either existing urban development (Calabasas Park), areas contiguous to urban infrastructure (Las Virgenes) or mapping scale differentials (Morrison Ranch in the Agoura area).

Finally, with regard to urban expansion within potentially active

faults, i.e., in the upper Point Dume area, the Malibu Civic Center/Pepperdine College area, and Trancas Beach area, the "D" acreage reflects either existing urban development or areas where urban services and infrastructure are available. It should also be noted that any development within these fault zones will be required to meet the latest requirements of the building code relative to seismic safety (as explained in Section 6.1 of the Final EIR).

Antelope Valley Planning Area

Virtually all of the urban expansion areas within the Antelope Valley located within "D" or "E" categories are areas within floodplains and with the exception of two areas within Quartz Hill, all of the areas are within either the City of Palmdale or the City of Lancaster. The very minimal acreage within Quartz Hill reflects an area already undergoing urbanization with urban infrastructure available where the flood hazard would be mitigated should urban development be approved. The other areas (within the cities) are designated for urban expansion chiefly because they are located within the urban core of the Valley. Furthermore, urban services are generally available, and many of these areas are adjacent to the major transportation hubs--the Antelope Valley Freeway, Sierra Highway and the Palmdale Airport.

Santa Clarita Valley Planning Area

The Santa Clarita Valley Areawide Plan was being adopted at the same time that ESRI was developing their capability/suitability material. However, the Department's consultants--Quinton-Redgate--prepared their own analysis which staff and a citizens advisory committee used to evaluate potential urban areas. Generally speaking the areas shown as urban expansion located within "D" and "E" categories were felt to be the most suitable areas for urbanization,

and the identified constraints were not so serious as to prevent reasonable controlled development. In many of the areas, infrastructure is either in place or readily available.

Nearly all of the urban expansion on "D" lands is located in the canyons and is in reasonable proximity to existing urban development. The basis for the "D" designation was the determination that many of these mapped areas have slope stability problems. However, the intent of the Santa Clarita Valley Areawide Plan is that all development occur in the less steep areas to minimize grading and preserve the natural terrain. The Santa Clarita Valley Plan's flexibility standards are designed to permit the redefinition of the Hillside Management line down to the toe of the 30% slope.

In addition, some of the areas have already been developed. For example, the Valencia Industrial Center has had a great deal of development occur to date while an area immediately southerly of the Santa Clara River adjacent to Sierra Highway is developed with a mobilehome park.

It is important to remember that proposed urban development within the "D" land in the Santa Clarita Valley will be subject to the Hillside Management Performance Review procedure.

Conclusion Regarding Potential Urban Expansion on "D" and "E" Lands

As has been pointed out by planning area, the lands designated by ESRI as having a "low" or "very low" suitability for urban development can appropriately be classified for potential urban expansion in the Proposed General Plan. The ESRI designation did not take such suitability factors as the availability of infrastructure and proximity of existing urban development, the "demand" for housing or community preferences into account. In concurrence with plan policies

emphasizing concentrated development, the "D" and "E" lands mapped for potential urban expansion generally represent areas where infrastructure and services are readily available, near existing urban development, where the identified environmental hazards will be mitigated.

It must also be remembered that the mapped urban expansion represents only about two percent of the 539,000 acres in the county identified as "D" or "E" by ESRI. Nearly all of the "D" and "E" lands in the county are proposed for non-urban or open space uses.

APPENDIX II

RESPONSE TO COMMENT ON USING A
HIGHER POPULATION PER DWELLING UNIT
AND HIGHER LAND USE DENSITIES IN
URBAN EXPANSION AREAS

APPENDIX II
RESPONSE TO COMMENT ON USING A
HIGHER POPULATION PER DWELLING UNIT
AND HIGHER LAND USE DENSITIES IN
URBAN EXPANSION AREAS

The Center For Law in the Public Interest submitted the following comment (identified as comment #1.3.16 in Section 1.0 of this Supplement):

Comment: Why not use a higher population per dwelling unit figure in calculating the projected need for dwelling units ("demand") to house the future population increase (higher Population Per Dwelling Unit figures are projected by both SCAG and L.A. City), and/or alternatively, why not utilize higher land use densities for proposed new urban expansion and in-fill depicted on the land use maps ("supply")--either of which would (not) necessitate the need to designate such large areas of urban expansion? In this regard, Appendix C to the Final EIR shows that, of the 39,200 acres of proposed residential uses mapped by the PGP for the urban expansion areas, fully 37,900 acres (97%) are proposed for "low" and "low/medium" densities, while a mere 1,300 (3%) are proposed for "medium" and "high" densities. This overwhelming percentage of low density residential "sprawl" type development in the urban expansion fringe areas is wholly unexplained, and the obvious alternative/mitigation measure of designating something less than 97% of urban expansion areas for low density residential development remains wholly unexplored.

Response:

A key assumption in the development of the projection for Los Angeles County is that the average number of persons per house-

hold (PPHH) will decline from present levels; but at a declining rate.* As a result, the average PPHH is projected at 2.53 by the year 2000, assuming a five percent vacancy rate and a 180,000 non-household population. For 1975, this figure was estimated at 2.69 PPHH. The rationale for projecting such a decline was based on trend analysis and projections of fertility rate and household formation trends.

With regard to the projection of the fertility rate, the Proposed General Plan assumed that the 1976 county fertility rate of 2.00 children per woman of childbearing age would persist to the year 2000. As noted in the plan, although this rate is below the population replacement level of 2.11 births, it is somewhat higher than the 1976 national rate of 1.77 (see the General Goals and Policies Chapter, pg. 35 and 37). This assumption reflects an expectation that the decline in births will level off and remain at a relatively low level, despite a long-term decline in fertility rates.

In order to identify the rate at which individuals and families form new households, thereby creating a demand for housing units, a household formation methodology was used that was developed by the U. S. Census Bureau. This methodology involved an analysis of trend data on household by age of household head, the average

* The Proposed General Plan uses both the persons per housing unit (PPHU) and persons per Household (PPHH) figures in its estimates and projections. However, the persons per household figures are considered the more representative of actual housing demand because various skewing factors, such as vacant units and the non-household population, have been eliminated from the calculations. For informational purposes, the (PPHU) figure is projected at 2.46 for the year 2000, as contrasted to the estimated 2.58 in 1975.

size of households and families, marital status, age, etc. Two primary assumptions were incorporated into the analysis: first, that the data yielded from the Chevan Model computer run would accurately identify the county population by age and sex; and second, that 1970 marital and household status data would remain equally valid during the 1975 to 2000 period.

Also examined were the population and housing trends and projections for the nation, state, SCAG region and cities within the county and historical (1940-1970) countywide and planning area trend data. Overall, these substantiate the projected decline in the average number of persons per household and housing unit rates. In addition, contrary to allegations made in the aforementioned comment by the "Center," the projections of SCAG of 2.45 and the City of Los Angeles of 2.38 persons per housing unit by the year 2000, are both close to the plan's projection of 2.46.* Finally, the following trend data for the period 1970 to 1978, is also very supportive:

* The PPHU projection figure (7,771,000 population divided by 3,180,000 housing units = 2.44) was taken from: Southern California Association of Governments, "Draft SCAG - 78: Growth Forecast Policy" August, 1978. For the City of Los Angeles, the PPHU figure (3,191,000 population divided by 1,342,100 housing units = 2.38) was taken from: City of Los Angeles, Department of City Planning. "Proposed Housing Plan: An Element of the General Plan" July 10, 1979.

TRENDS IN AVERAGE HOUSEHOLD SIZE, 1970-1979
FOR LOS ANGELES COUNTY

	<u>Occupied Units</u>	Estimated Household Population	Persons per Household (PPHH)
July 1970	2,436,000	6,899,000	2.83
July 1975	2,543,000	6,846,000	2.69
July 1976	2,587,000	6,891,000	2.66
July 1977	2,633,000	6,913,000	2.63
July 1978	2,666,000	6,974,000	2.62
Jan. 1979	2,693,000	6,998,000	2.60

In conclusion, the projected persons per household figures were based on an exhaustive analysis of existing trends, using established methodologies. It should be noted that if significant shifts in existing trends are identified by the proposed Monitoring System, appropriate revisions to the number of persons per housing unit could be initiated.

With regard to acreage differences in the urban residential density classifications in urban expansion areas, a mere comparison as was made by the "Center" is misleading. Many more dwelling units can be constructed in areas designated for high versus low residential density use. Countywide, the low to low-medium density residential categories account for 413,000 acres, or about 84% of all residential acreage depicted on the Land Use Policy map; whereas 79,800 acres were allocated for medium to high density residential use. As might be expected, a majority of the medium to high density residential acreage has been allocated to the older urban areas, reflecting existing conditions and the plan's selective recycling and revitalization strategies.

Despite the high percentage of mapped low and medium density residential acreage, the projected mix of new dwelling units to be constructed between 1975 and 2000 is overwhelmingly in favor of medium to high residential dwelling units. Of the estimated 612,000 new units projected to be constructed, nearly 443,000 are anticipated to be of a medium to high density nature.

With respect to the San Fernando, Santa Clarita Valley, Malibu/Santa Monica Mountains and East San Gabriel Valley planning areas, where 97% of all of the mapped urban expansion acreage is located (outside of the Antelope Valley planning area), the projected mix of new dwelling units is balanced. Within urban portions of these areas, new construction is projected at 85,700 new medium to high density residential dwelling units as contrasted to 76,600 low to low-medium density residential units.

The relatively high percentage of low to low-medium density residential acreage mapped in the urban expansion areas is based on a variety of factors. One is the greater acreage required by low density residential uses in order to accommodate the projected number of new dwelling units. A more important reason is the strong community preference for new residential development that is compatible with existing low densities. In addition, the market place has traditionally placed a high demand on single-family detached dwelling units in urban expansion areas.

In keeping with the policy direction set by the Regional Planning Commission on March 16, 1977, the Proposed General Plan reflects "a strong desire on the part of local communities that their plans be recognized in the Countywide General Plan...". Consequently, the Land Use Policy map represents a more generalized version of adopted or proposed local plans, where these plans are supportive

of countywide and regional goals and policies. The formulation of these plans and the identification of appropriate urban density classifications typically involved an analysis of land suitability/capability factors, the capacity of existing and planned service systems and infrastructure, general use compatibility criteria and the preference expressed by local residents regarding future community growth and development. For example, low densities were chosen for urban areas with slopes in excess of 15%, particularly in the formulation of the Santa Clarita Valley Areawide General Plan. It was also an important consideration in the identification of land uses south of the Ventura Freeway in the Draft Proposed Malibu/Santa Monica Mountains Areawide General Plan. North of the Ventura Freeway, the primary factor limiting high residential densities was potential flooding along Medea Creek and local access problems. With respect to that portion of the Malibu taking access from Pacific Coast Highway, traffic capacity was the limiting factor. In the case of the adopted Hacienda Heights Community Plan and the proposed Rowland Heights Community Plan, very little undeveloped flat land was available for high residential density use. However, what was available was so designated.

In the Antelope Valley, low to low-medium density dwelling units are expected to continue to dominate new construction. By the year 2000, 30,000 new low to medium-low dwelling units are projected to be constructed in the urban areas, as contrasted to 10,500 new medium to high density units. Consequently, most of the urban expansion acreage on the Land Use Policy map has been designated for low density residential uses. Medium to high density residential uses have been focused in three major intensity centers which formed the basis of the Antelope Valley Areawide General Plan. These are the Lancaster, Palmdale and Quartz Hill areas, each of which is in direct proximity to the proposed

airport and existing and proposed transportation corridors.*

An important point omitted by the aforementioned comment of the "Center" is that implementation of the Proposed General Plan is not derived solely from policy map interpretation, particularly the Land Use Policy map. The plan provides the following opportunities for increasing urban densities, subject to appropriate criteria, in order to increase the supply of affordable housing and to preserve environmentally sensitive areas:

Density Transfer

In urban areas with slopes in excess of 25%, the transfer of densities is permitted to allow higher densities on those portions of a project site most suitable for development, while retaining the more environmentally sensitive or hazardous areas in permanent open space. These provisions should be especially effective in areas designated for low density due to environmental considerations, such as topography.

* In response to a motion made by the Board of Supervisors to consider "the feasibility of modifying the Proposed General Plan to provide increased residential densities...in and around the area of Quartz Hill", the North County Citizens' Planning Council (NCCPC) considered various alternatives to increase densities in the Quartz Hill community. After careful review and deliberation, the NCCPC adopted a position recommending no change to the Plan since it "contains sufficient excess capacity to insure that the costs of housing are not adversely affected." On November 2, 1979, the Regional Planning Commission took action to support the NCCPC position by adoption of a recommendation of "no change" in response to the Board motion.

Density Bonus

Under the proposed density bonus program, a developer could build more dwelling units than normally allowed by the plan or zoning ordinance. In exchange, the county would receive the public benefit of having a guaranteed number of those bonus dwelling units reserved as affordable housing for low and moderate income households. The developer, on the other hand, would have a certain number of market-priced bonus units available to sell or rent at a market rate. The overall density bonus could range up to 50%.

The application of this incentive would be in unincorporated areas throughout the county and would be in addition to any other provisions provided by the areawide and community plans. These provisions are designed to significantly increase opportunities for developing affordable housing by providing density incentives to encourage the market-place to build more lower-income units at higher densities and fewer single-family detached units.

Residential Infill Procedures

The Proposed General Plan encourages residential infill at densities compatible with and slightly higher than those of surrounding uses. In light of this policy emphasis, the plan permits the density of new residential development in existing urban areas to exceed that depicted on the Land Use Policy Map, subject to conformance with criteria to ensure the design and use of the proposed project are suitable for the area involved.

APPENDIX III
RESPONSE TO COMMENT ON THE
RELATIONSHIP BETWEEN GENERAL PLAN
TEXTUAL AND MAPPED POLICY

APPENDIX III

RESPONSE TO COMMENT ON THE RELATIONSHIP BETWEEN GENERAL PLAN TEXTUAL AND MAPPED POLICY

The Center For Law in the Public Interest submitted the following comment (identified as comment #1.3.17 in Section 1.0 of this Supplement):

Comment: The relationship between the plan's textual policies and the land use allocations depicted on the plan maps must be discussed in the EIR.

Response:

It should be noted that to a large degree, Proposed General Plan policy maps incorporate and reflect the more detailed local land use and circulation patterns established by city and unincorporated community plans. These maps, although varying in terms of scale and level of generality, are designed to be consistent with, and mutually supportive of one another. For this reason, the following discussion does not distinguish between the mapped policies of community and countywide components of the Proposed General Plan.

I. Introduction

A basic objective of the Proposed General Plan is to achieve a more concentrated form of urban development, focusing future growth and development in suitable locations. In this regard, the Proposed General Plan encourages the revitalization of older declining urban areas, the maintenance and enhancement of sound existing urban communities, the infilling of bypassed vacant parcels within established urban areas, and the future expansion of urban uses within areas

suitable for such development. This overall policy direction is designed to accomodate moderate population and economic growth, while at the same time maintaining the character of existing communities, preserving environmental quality and mitigating potential adverse impacts associated with future growth.

While the basic policy thrusts of the Proposed General Plan are reflected in numerous textual statements, projections, and maps, this report will focus on the relationship between textual and mapped policies. Accordingly, the following will be directed toward the identification of major plan policies, and the manner in which such policies are reflected by various plan policy maps. However, in order to place this discussion in proper perspective, a brief comment regarding the nature of the comprehensive, county-wide general plan is necessary.

II. General Perspective

The Proposed General Plan sets forth objectives and policies addressing a wide variety of topics and issues. Because of its comprehensive nature, overlap and competition between policies is unavoidable. For example, policies designed to encourage the provision of affordable housing in sufficient type and quantity to meet current and projected demand may, in some instances, compete with policies to protect open space lands and preserve significant environmental resources. Similarly, policies to promote a more concentrated pattern of urban development may compete with policies to protect the character of existing urban communities. Such competition and overlap does not imply inconsistency among plan policies, but simply reflects the comprehensive nature of the plan document. In fact to argue that a comprehensive plan should embody policies to address a wide variety of issues, and that these policies should be mutually exclusive, avoiding overlap and

competition, is to underestimate the complexity of long range comprehensive planning, especially in dynamic, complex urban areas.

It should be further noted that there is not a direct one-to-one relationship between general goals and policy statements and the policy maps of the Proposed Plan. Not all textual policies can be reflected by the plan's policy maps, nor can the geographic implications expressed by policy maps be adequately stated in textual form. For example, the General Development Policy Map depicts areas in which various forms of development or redevelopment are appropriate (i.e., urban revitalization, maintenance, infill, and expansion). Similarly, the map identifies areas in which urbanization is not appropriate due to lack of supporting services and facilities. While the map identifies areas committed to, or suitable for urban use, it is not predictive and does not suggest that all such areas will be developed or redeveloped by the year 2000. The General Development Policy Map identifies geographic area in terms of their consistency with selected plan policies, and must be viewed in combination with related textual statements and projections to determine the priorities and magnitudes implied by overall general plan development policy.

III. Major Policy Components: Identification and Mapped Depiction

As the introductory comments suggest, the Proposed General Plan embodies a wide range of complementing, and in some cases competing, policies and objectives. Because it would be unproductive to reiterate the entire content of the Proposed General Plan within the context of this discussion, the following will focus on the relationship between textual and mapped expression of three major policy components. Major policy areas addressed below include Urban Form policy, General Development policy, and Resource Conservation/Environmental Quality policy.

A. Urban Form Policy

The basic Urban Form concept of the Proposed General Plan has evolved from the identification of a high intensity/high activity urban core area, together with a multinucleated system of regional and subregional activity centers. The maintenance and enhancement of this "centers-oriented" urban form concept is a key component of the Proposed Plan and is emphasized throughout the document.

For example, the General Goals and Policies Chapter sets forth a number of policies addressing urban form issues. A basic policy in this regard is to:

"Focus intensive urban uses in an interdependent system of activity centers located to effectively provide services throughout the urban area and supported by adequate public transportation facilities." (General Goals and Policies Chapter, Policy No. 24)

The Urban Form Policy Map in turn, identifies a system of 117 multipurpose and single purpose centers, a regional core area, and number of linear activity areas. Identified centers are located throughout the urban subregions of the county and are distinguished by both function and scale.

The Proposed Land Use Element supports basic urban form policy through land-use related policies designed to:

"Concentrate well designed high density housing in and adjacent to centers to provide convenient access to jobs and services without sacrificing livability or environmental quality"; (Land Use Element, Policy No.1)

and to,

"Place major emphasis on channeling new intensive commercial development into multipurpose centers." (Land Use Element, Policy No. 3).

Here again, the Land Use Policy Map reflects a compatible mix of higher intensity residential, commercial and public uses within areas identified as regional centers.

The Transportation Element and related Transportation Policy Map further support the basic urban form concept by proposing major improvements in public transit design to serve the urban core area and to help link identified major centers.

Finally, the basic urban form policies of the Proposed General Plan are again reflected and supported by the Economic Development Element. The Economic Development and Revitalization Policy Map reflects major commercial and office employment centers consistent with the identification of regional centers on the Urban Form Policy Map.

In summary, basic urban form policies initially set forth in textual form by the General Goals and Policies Chapter of the Proposed Plan, are consistently expressed by both textual and mapped policy components of the various plan elements.

B. General Development Policy

The general development policies set forth in the first chapter of the Proposed General Plan establish basic parameters for future growth and development within Los Angeles County and describe the processes by which such growth is projected to occur. A key policy in this regard is to:

"Promote the efficient use of land through a more con-

centrated pattern of urban development, including the focusing of new urban growth into areas of suitable land." (General Goals and Policies Chapter, Policy No. 17)

Basic development policies applicable to existing urban areas emphasize the revitalization of older declining urban communities, the compatible development of bypassed parcels within established urban areas and maintenance of sound existing urban communities and neighborhoods.

A fundamental policy pertaining to future urbanization of presently undeveloped areas states:

"Ensure that new development in urban expansion areas will occur in a manner consistent with stated Plan policies and will pay for the marginal public costs (economic, social and environmental) that it generates." (General Goals and Policies Chapter, Policy No. 22)

This policy is directly linked to a range of additional policies addressing land capability (environmental constraints and resources) and land suitability (service availability, community character, etc.) factors.

Lastly, general development policies applicable within designated non-urban areas are designed to assure that future low intensity development within such areas will not be disruptive to the maintenance of rural lifestyles, will not necessitate the expansion or extension of urban services, will not increase public exposure to environmental hazards and will not cause significant adverse environmental impacts.

The general development policies of the Proposed Plan are supported by an array of articulated standards and condition for development, and are further expanded upon by various action programs set forth in the Plan's Implementation Chapter.

At the most general level, the General Development Policy Map illustrates the geographic implications of countywide development policy. The map identifies areas in need of revitalization, areas where maintenance and conservation strategies are appropriate, areas where future urbanization is not anticipated nor warranted. In combination, the Urban Form and General Development Policy Maps graphically describe the nature and potential geographic extent of the physical development and redevelopment processes envisioned by the plan during the coming decades.

Again, a cautionary note should be added regarding the illustrative nature of the policy map and the constraints imposed by its generalized format and scale. The General Development Policy Map does not intend to suggest that all areas identified for revitalization will undergo rehabilitation or recycle by the year 2000. It simply reflects areas of apparent need. The map does not identify all areas appropriate for urban infill. Due to scale and level of generality, only larger vacant parcels, typically exceeding fifty acres in size, are depicted.

With regard to identified urban expansion areas, again the map does not suggest or recommend that all such areas will be urbanized by the year 2000. Instead the map provides a general illustration of those areas which are potentially capable of supporting, and suitable for future urban development.

The General Development Policy Map is specifically intended to work in combination with other topical plan policy maps (as discussed

below) as well as plan provisions calling for the implementation of a development monitoring system and a "Development Qualification" procedure. The monitoring system will provide the mechanism necessary to measure the magnitude and distribution of future growth and development within Los Angeles County and compare such growth vis-a-vis plan projections and policy maps. Resulting data will provide the basis for gauging the effectiveness of implementation programs and amending the plan as future trends and conditions may warrant. The Development Qualification procedure is intended and designed to assure that future development within identified urban expansion areas occurs in a logical manner, avoids or mitigates potential adverse environmental impacts, and pays for the marginal public costs that it generates.

The Conservation and Open Space Element addresses an array of concerns related to preservation of environmental resources and avoidance of environmental hazards. In doing so, element policy maps (i.e., Conservation and Open Space Policy Map, Special Management Areas Policy Map) generally describe the nature, extent and distribution of significant resources and hazards posing constraints for future urbanization. These maps serve to amplify and support general development policies applicable within various non-urban regions of the County.

Land Use Element policies reiterate concerns related to land capability/suitability and efficient use of existing urban infrastructure, and interrelate such factors with use compatibility concerns. The Land Use Policy Map, together with supporting and more detailed city and unincorporated community plan policy maps, generally illustrates a compatible pattern of land use types and intensities, consistent with the parameters established by overall development policy.

Other plan elements and related policy maps support and expand upon

various aspects of general development policy. The Housing Development and Neighborhood Conservation Policy Map focuses on those areas identified for residential use by the Land Use Policy Map, and identifies general development policies applicable within various geographic sub-areas(i.e. residential revitalization, maintenance, infill, expansion, etc.). Transportation and Water and Waste Management policy maps identify service improvements and extensions necessary to support overall development policy. In short, the elements and policy maps of the Proposed General Plan are each designed to support and expand upon various aspects of countywide general development policy.

C. Resource Conservation/Environmental Quality

Resource conservation/environmental quality policies are again initially set forth in the General Goals and Policies Chapter of the Proposed Plan.

Two basic policies include the following:

Direct urban development and revitalization efforts to protect natural and man-made amenities and to avoid severe hazard areas, such as flood prone areas, active fault zones, steep hillsides, landslide areas and fire hazard areas. (General Goals and Policies Chapter, Policy No. 9.)

Protect areas that have significant natural resources and scenic values, including Significant Ecological Areas, the Coastal Zone, and prime agricultural lands. (General Goals and Policies Chapter, Policy No. 10.)

These and related policies are, in part, reflected on the General

Development Policy Map. Within designated non-urban areas, the map specifically depicts Significant Ecological Areas and more generally identifies non-urban hillsides, open space and agricultural areas.

Resource conservation and environmental quality concerns are most specifically addressed within the context of the Conservation and Open Space Element. This Element sets forth policies designed to meet a number of identified needs, including the need to improve air and water quality, conserve energy, protect prime agricultural lands, conserve natural areas, protect public safety, provide additional outdoor recreation areas, and promote community beautification and landscaping. While some of the policies articulated cannot be expressed in mapped form, many are. The Conservation and Open Space Policy Map identifies areas committed to or proposed for permanent open space purposes. In addition, the map generally depicts other open space lands subject to the various special management provisions of the plan. Together, these lands constitute the plan's basic open space concept and system.

The Special Management Areas Policy Map expands upon the more generalized Open Space and Conservation Policy Map by identifying Significant Ecological Areas and associated Buffer Areas, Hillside Management Areas*, Potential Agricultural Preserves, the Coastal Zone, Scenic Highways, Mineral Resource Areas, Flood Prone Areas, and Major Fault Zones. In doing so, the map supports textual policies of the plan and reflects their geographic implications.

* The mapping of Hillside Management Areas is highly generalized and intended to be illustrative in nature. Areas subject to the hillside management provisions of the plan are specifically defined as any area having a natural slope of 25 percent or greater.

The resource conservation/environmental quality policies of the Proposed Plan are further supported by the policies, conditions and standards of the Land Use Element. Lands characterized by the presence of significant natural resources or hazards are by and large, depicted as non-urban areas on the Land Use Policy Map. Here, open space areas and Significant Ecological Areas are specifically delineated.

Finally, the Transportation Element supports plan policies pertaining to resource conservation and environmental quality by establishing policies and standards for transportation-related facilities which may traverse or otherwise impact environmentally sensitive areas.

In summary, resource conservation and environmental quality concerns are a key focus of Proposed Plan policy, and are consistently addressed by both textual and mapped components of the various plan elements.

IV. Summary and Conclusion

As indicated in the introductory paragraphs, the intent of this discussion is to describe the interrelationship between textual and mapped policies of the Proposed General Plan. The examples explored above indicate that despite unavoidable competition, the relationship between various expressions of plan policy is essentially consistent and mutually supportive. This conclusion can be more thoroughly borne out by a comprehensive review of the complete plan document.

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